

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 19 CIV. 11764 (AT) KHP)

ARLENE DELGADO,

Plaintiff,

-vs-

DONALD J. TRUMP FOR PRESIDENT
INC., SEAN SPICER,
Individually, REINCE PRIEBUS,
Individually, STEPHEN BANNON,
Individually,

Defendants.

/

LOCATION: AUDIO-VISUAL COMMUNICATIONS

DATE: Thursday, March 21, 2024

TIME: 10:10 a.m. - 1:43 p.m.

DEPOSITION OF JESSE BINNALL

Reported By:
Guerlin Kelly Boyd, Court Reporter
Notary Public, State of Florida



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1 APPEARANCES:

2

3 On behalf of the Plaintiff:

4

ARLENE DELGADO, PRO-SE

5

6 On behalf of the Defendants:

7

JARED E. BLUMETTI, ESQ.

8

LAROCCA HORNIK ROSEN GREENBERG & BLAHA

9

The Trump Building

10

40 Wall Street

11

32nd Floor

12

New York, NY 10005

13

(212) 530-4831

14

JBlumetti@LHRGB.com

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EXAMINATIONS

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PLAINTIFF'S EXHIBITS

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DEFENDANT'S EXHIBITS

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	NONE	

1 Deposition taken before Guerlin Kelly Boyd, Florida
2 Professional Reporter and Notary Public in and for
3 the State of Florida at Large, in the above cause.

4 - - -

5 Thereupon,

6 JESSE BINNALL,
7 having been first duly sworn or affirmed, was
8 examined and testified as follows:

9 THE WITNESS: I do.

10 BY MS. DELGADO:

11 Q. Good morning, Mr. Binnall.

12 A. Good morning, Ms. Delgado.

13 Q. Did I pronounce it correctly? I was
14 wondering.

15 A. You did.

16 Q. Okay. Great. Okay. I believe you're
17 an attorney so I'm sure you're familiar with the
18 ground rules for depositions, but nonetheless let
19 me just lay out a couple of the standard ones.

20 Obviously answer clearly if you can.
21 Use yes or no instead of "uh-huh" or "uh-uh." If
22 we interrupt each other, let's try not to so that
23 the court reporter is able to type out correctly
24 what it is we're saying.

25 If I do interrupt you, as you know

1 with Zoom sometimes there can be a delay, please
2 let me know if you're not finished answering a
3 question, it's not deliberate.

4 And I need to -- if you need to take a
5 break, please, let me know for any reason. Just
6 don't confer with Mr. Blummetti during that break.
7 I do need to take a break in about 90 minutes to
8 order my son's lunch for school, so hopefully you
9 will hear an alarm go off in about 90 minutes. So
10 we'll definitely have a break planned in 90
11 minutes, but if you need one earlier, just let me
12 know.

13 And I will also be taking notes and
14 typing out notes, some handwritten, some on my
15 screen, looking at some notes on my screen so if
16 I'm not looking at the screen directly at you,
17 please don't take offense. It's just the way I'm
18 working this. Okay?

19 **A.** Yes, ma'am.

20 **Q.** Does that all make sense?

21 **A.** I understand the instructions, ma'am.

22 **Q.** Oh, okay. Great. Thank you.

23 All right. So please state your name
24 for the record?

25 **A.** Jesse Binnall.

1 **Q.** And where do you reside?

2 **A.** I reside in Alexandria, Virginia.

3 **Q.** Okay. And you work as an attorney; is

4 that correct?

5 **A.** That's right, ma'am.

6 **Q.** And do you have a law firm you work in

7 or your own law firm?

8 **A.** I do have a law firm that I'm the

9 principal of, that's correct.

10 **Q.** Okay. And what is the name of that

11 firm, please?

12 **A.** The Binnall Law group.

13 **Q.** Okay. How long have you been there?

14 **A.** Binnall Law Group was formed on I

15 believe March the 1st of 2021. I've been there

16 since that point.

17 **Q.** Great. And prior to that, say just

18 going back five years or so, where did you

19 practice?

20 **A.** The only other place that I've worked

21 in a five-year period was in my previous law firm

22 and that was Harvey & Binnall at which I was a

23 partner.

24 **Q.** Could you spell that, please?

25 **A.** Yeah, Harvey, H-A-R-V-E-Y, & Binnall



1 B-I-N-N-A-L-L.

2 Q. Got it. Okay. Thank you. And you
3 were a principal there as well?

4 A. I was a partner there, yes.

5 Q. A partner. Okay. And the office for
6 Harvey & Binnall was located where, sir?

7 A. Same place as my office is now and
8 that's 717 King Street in Alexandria, Virginia.

9 Q. Okay. Thank you. Have you ever had
10 the Donald J. Trump for President campaign as a
11 client?

12 A. Yes, ma'am.

13 Q. Okay. What years -- in what years
14 have you had that entity as a client?

15 A. Donald J. Trump President, Inc. was a
16 client in 2016 and then again in 2020 and then from
17 2021 forward till today.

18 Q. So in 2016, in 2020, and then I'm
19 sorry you said in --

20 A. 2021 forward.

21 Q. 2021 onwards. Got it. Okay.

22 MS. DELGADO: Kelly, I have an exhibit
23 I wanted to show. Is it easier if I e-mail it to
24 you or because I'm -- versus logging in from a
25 different device to upload that to the screen, what



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1 do you prefer?

2 (Thereupon, an off-the-record
3 discussion was had.)

4 MS. DELGADO: Okay. Okay. Let me
5 circle back to that then because I'm going to need
6 to log in from the device on which I have the
7 exhibits. So I will circle back to that.

8 Sure. Let's do that to not go out of
9 order. Just give me 30 seconds to log in from this
10 device.

11 BY MS. DELGADO:

12 Q. In the meantime can you describe to me
13 what the work you did in 2016 for the Donald J.
14 Trump for President Campaign?

15 MR. BLUMMETTI: Objection.

16 THE WITNESS: Yes, in 2016 I worked on
17 the delegate team. And so most of the work
18 that I did was in the spring of 2016 and
19 then again in the summer at the Republican
20 National Convention.

21 BY MS. DELGADO:

22 Q. And to be clear, that work was in a
23 legal capacity as an attorney?

24 A. So it actually was as a professional
25 parliamentarian. And -- so I was not -- I was not

1 giving legal advice. I don't think there's any
2 point in 2016 where the Trump Campaign was a client
3 of my law firm. I believe it was as a -- as -- I
4 served them as a professional parliamentarian only.

5 Q. Could you describe what a
6 parliamentarian does?

7 A. Absolutely. A parliamentarian advises
8 people on internal rules. It advises them on
9 whether it's bylaws, standing rules, special rules
10 of order, party rules. And so during the delegate
11 selection process for delegates to go to the
12 convention I advise the campaign on various party
13 rules, and then again, at the Republican National
14 Convention I advise the campaign.

15 Q. So would it be accurate to say that
16 wasn't strictly in a legal capacity you were
17 advising the Donald J. Trump Campaign?

18 A. It wasn't in a legal capacity. It was
19 as a professional parliamentarian on internal rules
20 as opposed to on the law.

21 Q. Understood. Okay. And in 2020 what
22 part of -- was it after the election in 2020?

23 A. So I was engaged in 2020 to help with
24 election integrity efforts and I -- my engagement
25 ran around the beginning of October in that

1 capacity through the middle of December. And then
2 I also begin representing the campaign in a
3 litigation matter in December of 2020 as well and
4 that representation continues.

5 Q. What matter -- what lawsuit or matter
6 was that?

7 A. It was Michigan Welfare Rights
8 Organization versus Trump.

9 Q. And that is still ongoing you said?

10 A. Yes, ma'am.

11 Q. Okay. And what about the work that
12 you said in 2021 onwards?

13 A. I represented -- I represented the
14 campaign and a number of lawsuits. I probably
15 wouldn't even be able to remember them all sitting
16 here today. I can certainly remember some of them;
17 Smith versus Trump which is ongoing; Swalwell
18 versus Trump; Blassingame versus Trump; Lee versus
19 Trump, and -- well, let me amend that.

20 I represent the campaign in the cases
21 of Smith versus Trump. The Swalwell and Lee cases
22 I do not believe the campaign is a party to so I
23 represent the president in those cases.

24 Q. So you represent the campaign as its
25 attorney in certain present cases; is that correct?

1 **A.** Yes, ma'am.

2 **Q.** And in other cases such as Swalwell
3 you represent not the campaign but perhaps Mr.
4 Trump; is that correct?

5 **A.** That's correct.

6 **Q.** Okay. Understood. Let me bring up
7 right now -- that is me sorry. Let me mute myself.

8 **A.** I'm not going to be able to understand
9 you.

10 **Q.** Is this better?

11 **A.** So far.

12 **Q.** Okay. Still an echo?

13 **A.** I've had to deal with this before. If
14 you turn the sound off on your laptop I think
15 you'll be home free. It's back.

16 **Q.** How about now?

17 **A.** No.

18 **Q.** Still there. Yep. Can you see the
19 screen?

20 **A.** Yes.

21 **Q.** Would the best way be for me to e-mail
22 this document to the court reporter and she can now
23 show it on her screen so I can turn this off?

24 And Mr. Binnall, also if you're able
25 to open it in the chat maybe you can scroll --

1 I certainly don't want to cause delay
2 with the exhibit. We'll come back to it at the end
3 then.

4 Mr. Binnall, regarding the cases
5 you've worked on or are working on, let me ask you
6 about some of those. You stated you worked on
7 current present cases in which the Trump Campaign
8 is a defendant and also some in which other
9 individuals from Trump world such as Mr. Trump are
10 defendants or plaintiffs; is that accurate?

11 **A.** The first part of your question is
12 accurate. The second part of your question as to
13 the campaign being a party to my litigation, the
14 litigation to which I'm a counsel on.

15 The second part I represent the
16 president in -- have since 2020 represented him not
17 personally. As far as other people in quote
18 unquote "Trump world" you'd have to be more
19 specific.

20 **Q.** Okay. Do you represent Donald Trump,
21 Junior in lawsuit?

22 **A.** I do not represent him. Well, I only
23 represent him as in regards to a third party
24 subpoena.

25 **Q.** Okay. So you do represent him in



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1 regards to information sought from him; is that
2 correct?

3 **A.** Correct, that's correct.

4 **Q.** And you represent Donald Trump in,
5 would it be accurate to say, in at least three
6 separate lawsuits?

7 **A.** At least, yes.

8 **Q.** Okay. Do you represent various former
9 Trump administration officials in various lawsuits?

10 **A.** Yes.

11 MR. BLUMMETTI: Form. If you could be
12 more specific.

13 MS. DELGADO: Of course.

14 BY MS. DELGADO:

15 **Q.** Do you represent Richard Rick Grenell,
16 a former Trump administration official in a
17 lawsuit?

18 **A.** We have represented him in a lawsuit
19 before.

20 **Q.** It is currently no longer pending?

21 **A.** Correct.

22 **Q.** What about former Trump Administration
23 Official Lieutenant General Michael Flynn?

24 **A.** Yes.

25 **Q.** Is that one currently pending?



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1 **A.** Yes.

2 **Q.** What about former Trump Administration
3 Official Kash, and that is his nickname, K-A-S-H
4 Patel P-A-T-E-L?

5 **A.** Yes.

6 **Q.** That one is currently pending?

7 **A.** Yes.

8 **Q.** And the one where you represent former
9 president Donald Trump in which you referenced that
10 my description of at least three separate lawsuits
11 would be accurate, are those all currently pending?

12 **A.** Not all the lawsuits I've represented
13 him in are currently pending, but some of them are.

14 **Q.** How many are currently pending?

15 **A.** I would have to check my records. I
16 don't know off the top of my head.

17 **Q.** Is it more than two?

18 **A.** Yes.

19 **Q.** Okay. Do you represent former
20 President Donald Trump in any appeals currently?

21 **A.** Yes.

22 **Q.** More than one?

23 **A.** Not actively on appeal, no.

24 **Q.** Okay. Is the one you represent him
25 Trump versus Clinton?

1 **A.** Yes, ma'am.

2 **Q.** And please don't take offense to this
3 question, it's not personal, but were there
4 sanctions issued in that matter against --

5 **A.** Not against me.

6 **Q.** Okay. Not against you. Those
7 sanctions were against Ms. Alina Habba; is that
8 correct?

9 **A.** Yes, ma'am, and others. We're
10 appellate counsel in that case.

11 **Q.** Okay. Understood. So the sanctions
12 were against the lower court counsel?

13 **A.** That's correct.

14 **Q.** Okay. Understood. Thank you.

15 Are you a colleague -- let me not use
16 it in the loose sense of the word.

17 Have you worked alongside Sidney
18 Powell on any efforts be it in a legally official
19 format or otherwise?

20 **A.** Can I ask you to be a little bit more
21 specific?

22 **Q.** That was poorly phrased.

23 Have you worked alongside Sidney
24 Powell on any matters not limited to legal matters?

25 **A.** I have worked alongside her on legal

1 matters.

2 **Q.** On what legal matters?

3 **A.** United States versus Michael Flynn.

4 **Q.** United States versus Michael Flynn?

5 **A.** Correct.

6 **Q.** Okay. Did you start a pact with Ms.
7 Powell?

8 **A.** Very, very briefly and although the
9 pact we ended up dissolving that pact before it did
10 any business. And I was not actively involved in
11 that pact other than being the one to file the
12 paperwork, but it never did anything.

13 **Q.** And what was the purpose of the pact?

14 **A.** I honestly don't remember.

15 **Q.** Okay. Have you been involved in any
16 efforts regarding questioning the integrity or the
17 outcome of the 2020 election?

18 MR. BLUMMETTI: Objection to form.

19 Objection to relevance.

20 BY MS. DELGADO:

21 **Q.** I'll rephrase it.

22 Have you been involved in any efforts
23 to question the out -- question the outcome of the
24 2020 election?

25 MR. BLUMMETTI: Same objections.



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1 THE WITNESS: I have been counsel in
2 an election contest, yeah.

3 BY MS. DELGADO:

4 **Q.** An election, can you tell me more
5 about that? Is it an election contest you said?

A. I did say that.

7 **Q.** Okay. Can you tell me a bit about
8 that?

9 MR. BLUMMETTI: Objection to form.

10 BY MS. DELGADO:

11 **Q.** If you could, please, elaborate on
12 what you -- I'll rephrase it.

13 Could you please elaborate on what you
14 mean by an election contest?

15 **A.** It was a lawsuit filed in the state of
16 Nevada pursuant to Nevada state law regarding the
17 outcome of the 2020 Nevada election. I think the
18 case was Law versus Whitmer. I do not know how to
19 spell Whitmer, sorry.

20 Q. Sorry, go ahead.

21 **A.** No, that's my answer.

22 Q. That's it. Okay.

When you say the 2020 Nevada election
do you mean the presidential election in Nevada?

25 **A.** In Nevada, yes.

1 Q. Are you familiar with the term quote
2 "stop the steal" unquote?

3 MR. BLUMMETTI: Objection to form.

4 THE WITNESS: I've heard it.

5 BY MS. DELGADO:

6 Q. Okay. Would you agree that that is a
7 description of a general idea of questioning the
8 integrity of the 2020 election outcome or
9 questioning the results?

10 A. I have no idea.

11 MR. BLUMMETTI: Objection. Calls for
12 speculation.

13 BY MS. DELGADO:

14 Q. Have you been involved in any efforts
15 that would be described by anyone as part of the
16 "stop the steal" efforts?

17 MR. BLUMMETTI: Objection to form.

18 Objection to relevance.

19 THE WITNESS: I wouldn't know how to
20 answer that. Certainly not the way that I
21 would see it, no.

22 BY MS. DELGADO:

23 Q. Okay. Do you believe Donald J. Trump
24 won the 2020 election?

25 MR. BLUMMETTI: Objection to the form.

1 THE WITNESS: My mental impressions
2 about litigation, litigation that I've been
3 a part of are protected by the attorney
4 work product attorney doctrine so I'm not
5 going to be able to answer that question.

6 BY MS. DELGADO:

7 **Q.** I don't mean the impressions you have
8 from a legal angle. I mean do you personally as a
9 US citizen and voter, I assume you're a voter, do
10 you personally believe that Donald J. Trump won the
11 2020 election? Don't give me any of your --

12 **A.** Ma'am, I can't answer that without
13 sharing the -- it's impossible to divorce that
14 knowledge from the information I have as a lawyer.
15 That's attorney work product. I'm afraid I can't
16 answer you on that.

17 **Q.** So you're claiming attorney work
18 product privilege over your own belief as to
19 whether Donald Trump won the election in 2020?

20 **A.** I've said the information you sought
21 is protected by attorney work product. I cannot
22 answer that question.

23 **Q.** Right. If I could just clarify again,
24 so I'm just seeking to clarify what your position
25 is.

1 So are you -- is it correct that you
2 are asserting attorney-client privilege with
3 yourself over your own opinion as to whether Donald
4 Trump won the presidential election in 2020?

5 MR. BLUMMETTI: Objection.

6 Mischaracterizes the testimony. He said
7 work product.

8 BY MS. DELGADO:

9 **Q.** Right. Well, he's saying work product
10 and I'm asking him to explain what the work
11 product --

12 **A.** Ma'am, any mental impressions that I
13 form as part of litigation is protected by the
14 attorney work product doctrine and I cannot answer
15 as to my mental impressions. You're asking me for
16 my mental impressions, I cannot answer that
17 question.

18 **Q.** I'm asking you for your opinion as an
19 American --

20 MR. BLUMMETTI: Objection. Asked and
21 answered.

22 MS. DELGADO: -- what -- I'm
23 clarifying, he's under the impression I'm
24 asking him for his mental impressions.

1 BY MS. DELGADO:

2 Q. I'm not asking you for your mental
3 impressions based on your legal work. I'm asking
4 for your opinion whether --

5 A. Ma'am, I have no opinion other than
6 what comes from my mental impressions.

7 Q. Okay. Okay. We'll circle back.

8 I was trying to bring up a
9 spreadsheet, which I'm sure you saw the title was
10 payments to Mr. Binnall, but perhaps we don't need
11 to worry about the exhibit if we can make some
12 progress here on this question.

13 There was an article, Mr. Binnall,
14 stating that your firm -- you and/or your firm, of
15 which you are a principle, including your prior
16 Harvey & Binnall Firm as well as your current firm
17 has earned over \$4.2 million from the Trump
18 Campaign and/or the Trump Political Action
19 Committee; is that accurate?

20 A. I don't know what the total is. I saw
21 the spreadsheet that you had earlier that appears
22 to be derived from FEC reporting. I have no reason
23 to think that the FEC reporting is wrong. It is --
24 we have done a lot of work in a lot of matters and
25 so I don't doubt it to be true. I couldn't tell

1 you an exact number.

2 Q. Of course. And I -- again, it's not
3 personal. I don't mean to press you on or imply
4 that there's any -- any falsification in terms of
5 your impression.

6 Does the 4.2 million number, does that
7 same in the ballpark of what's correct?

8 MR. BLUMMETTI: Objection. Asked and
9 answered.

10 THE WITNESS: I have no information
11 about an exact number. There's nothing
12 that seems unreasonable about that number.
13 I just happen to not know the number.

14 BY MS. DELGADO:

15 Q. We'll put the spreadsheet up later
16 then. Okay. We'll come back to that.

17 And -- oh, to be clear that
18 4.2 million, assuming as you say that you have no
19 reason to doubt that number, that would be since --
20 I believe you said you were retained in
21 October 2020 so, that would be from October 2020 to
22 present day. Does that sound correct to you?

23 A. That sounds right.

24 Q. Okay. Thank you. And have you ever
25 worked for the Trump Campaign, not as an attorney,

1 but as a staff member or independent contractor of
2 any kind other than as an attorney?

3 **A.** Other than what I already told you
4 about as a professional parliamentarian in the
5 spring and summer of 2020, no.

6 **Q.** Okay. Why do you believe then you
7 were chosen as a 30(b)(6) witness?

8 MR. BLUMMETTI: Objection to form.

9 Calls for speculation.

10 BY MS. DELGADO:

11 **Q.** Just your personal opinion,
12 Mr. Binnall. I don't want you to speculate.

13 **A.** I don't know why I was selected other
14 than, you know, I think it's public information
15 that the campaign no longer has any employees. It
16 only has I think a single officer at this point.
17 So that's all the information that I have, so yeah.

18 **Q.** Okay. Where did you read that the
19 campaign currently has no employees? Or where did
20 you hear -- I'm sorry.

21 Where did you hear or read that?

22 **A.** I mean, that's federal election
23 committee disbursements. I've looked at the
24 disbursements and the disbursements are consistent
25 with the fact that the campaign, as far as I've

1 been able to see, has -- no longer has any
2 employees and it has not for I think for several
3 years now.

4 **Q.** Do you consider the 2016 campaign
5 election effort to be a different entity from the
6 current campaign?

7 MR. BLUMMETTI: Objection to form.

8 THE WITNESS: Yes.

9 BY MS. DELGADO:

10 **Q.** Okay. Why is that?

11 **A.** Because they're different entities.

12 **Q.** Have you had a chance to review the
13 topics in this 30(b) (6) notice?

14 **A.** Yes, ma'am.

15 MR. BLUMMETTI: Objection.

16 BY MS. DELGADO:

17 **Q.** Have you ever worked on any employment
18 discrimination matter in your legal work?

19 **A.** Yes, ma'am.

20 **Q.** On the plaintiff side or defendant
21 side?

22 **A.** Certainly the plaintiff side. I
23 believe we have done defense side work as well.
24 You know, a particular matter isn't coming to me,
25 but of course we've represented, you know, many,



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1 many clients over the years. So it's hard for me
2 to remember every single matter and what we've
3 done, especially on, you know, another topic here
4 in this deposition that hasn't been -- that's not
5 part of a topic that's been designated.

6 **Q.** Has any of that employment work that
7 you've done been for the Trump Campaign as a client
8 or any individual associated with the Trump
9 Administration or Mr. Trump?

10 MR. BLUMMETTI: Objection to form.

11 Compound.

12 BY MS. DELGADO:

13 **Q.** Yeah, I'll split it up. I'm trying to
14 keep the train moving. I'll split it up.

15 Has any of the employment work that
16 you've done as an attorney involved the Trump
17 Campaign as a client?

18 MR. BLUMMETTI: Objection.

19 THE WITNESS: I'm not thinking of any
20 off the top of my head, but I -- and this
21 is -- of course me not speaking on behalf
22 of the campaign as this has not been a
23 designated topic, but I -- not that I can
24 think of sitting here today.



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1 BY MS. DELGADO:

2 Q. Do you know what would help you
3 refresh your recollection if you were to, for
4 instance, check your files, would you be able to
5 give a more definitive answer?

6 A. It would take me some time to check
7 the -- to go through all of our matters to see if
8 there are, you know, which are employment matters
9 and, you know, with plaintiff side, defense side,
10 that would take a substantial amount of time. And
11 it hasn't been designated so --

12 MR. BLUMMETTI: I would just like to
13 object for the record as Mr. Binnall knows
14 that this is outside the scope of the
15 noticed topics of Mr. Binnall, and to the
16 best of his ability, which is all he's
17 required to do under the rules.

18 MS. DELGADO: I'm allowed to question
19 him on what matters he's worked on for the
20 entity on whose behalf he's appearing
21 today.

22 MR. BLUMMETTI: Correct, and he's
23 answered those questions to the best of his
24 ability.



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1 BY MS. DELGADO:

2 Q. And I'm allowed to ask -- he opened
3 the door by saying he may have -- I'm allowed to
4 ask what would help refresh his recollection and if
5 he has any documentation. So I will request that
6 subsequent to this. Okay?

7 A. Ma'am?

8 Q. Yes?

9 A. I was -- I was briefly retained in
10 another matter related to -- to you to get an
11 extension. And I did not actually substantively
12 litigate that matter, but we did get an extension
13 on responding to another matter regarding you. I
14 think that is probably an employment matter. I
15 don't remember the entity that I represented on
16 that, but it was an entity defendant.

17 Q. I want to make sure I understand you.
18 I'm sorry.

19 You were retained in a matter
20 involving me to obtain an extension on a --

21 A. An extension to respond on another
22 lawsuit that was I think more recently filed and
23 served, and I don't remember the entity. It was --
24 yeah.

25 Q. Would you be able to check your files



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1 especially given that you said it was recent to
2 ascertain what that was exactly?

3 **A.** I suppose it would be in a client
4 file. I don't know what I can tell you about what
5 was actually in a client's file. I will tell you
6 that that matter is being represented by Alina
7 Habba's law firm now and that -- it probably would
8 refresh your recollection more than it would mine
9 because it's an ongoing litigation.

10 **Q.** And as -- to be clear I'm not asking
11 you what's in the client's file, simply the name of
12 the matter. You stated that you were retained to
13 file an extension only; is that correct?

14 **A.** That is, that is the only work that we
15 did. We did not do any substantive work on it. As
16 far as anything else as to, you know, what would
17 be -- I'm not going to get into anything else other
18 than what we actually did as to avoid interfering
19 in any privilege or work product.

20 **Q.** Of course. I'm just trying to find
21 out the name of the matter. And what --

22 **A.** To my -- I believe it was the campaign
23 as the defendant. I believe you were the
24 plaintiff. I believe that it was also named Jason
25 Miller and James Massesage {ph}.

1 **Q.** Okay. Thank you. That helps clarify
2 what it was. Okay.

3 And that's not an employment
4 discrimination a matter per se. So on the
5 employment discrimination matter, you -- the
6 matter -- the employment discrimination matter is
7 that you say you may have represented the Trump
8 Campaign on, that's something you could perhaps go
9 back and check what the names of those matters
10 were?

11 **A.** It's -- like I say, it's possible I
12 could refresh my recollection on that. But yeah,
13 that's -- for information that I have in front of
14 me now, I've exhausted my memory in that.

15 **Q.** Fair enough. Okay. And on the topics
16 noticed in the 30(b)(6) notice, you believe you can
17 speak for the Trump Campaign on these --

18 MR. BLUMMETTI: Objection to form.

19 BY MS. DELGADO:

20 **Q.** -- on those topics on the notice?

21 **A.** I've been designated to speak on
22 behalf of the campaign on those and I've reviewed
23 various records in preparation for it.

24 **Q.** Okay. That's non -- I'm going to have
25 to object to that as nonresponsive. So let me ask



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1 it again.

2 Do you believe that you can speak to
3 the topics and answer on these topics that are
4 listed in the 30(b) (6) notice on behalf of the
5 campaign?

6 MR. BLUMMETTI: Objection to form.

7 BY MS. DELGADO:

8 Q. Let me rephrase it.

9 Regarding the topics and the 30(b) (6)
10 notice, do you believe that you have the
11 information necessary to speak and answer on behalf
12 of the campaign?

13 A. Yes, as to the information that --
14 that I was able to review, yes.

15 Q. Let me try to understand your answer
16 there. Yes, you answered yes as to the information
17 you were able to review?

18 A. Yes, ma'am.

19 Q. So you're qualifying your answer,
20 correct?

21 MR. BLUMMETTI: Objection to form.

22 THE WITNESS: Ma'am, I'm a 30(b) (6)
23 witness. In order to find out what kind of
24 information the entity you've noticed for
25 deposition has, I have to go and be able to

1 review information that that entity does
2 have. That's what I have done in this case
3 and that's what I'm prepared to answer
4 questions as to today.

5 BY MS. DELGADO:

6 Q. Sure. But the information that you
7 were able to review, was it sufficient that you
8 were able to answer and speak on behalf of the
9 campaign on all of these topics?

10 MR. BLUMMETTI: Objection to form to
11 the extent that the topics pertain to the
12 campaign.

13 THE WITNESS: Ma'am, I've -- I can't
14 answer as to what's sufficient or what's
15 not here. I've only -- I can only answer
16 as to what I've done and what -- what
17 questions that you asked of me. I have no
18 reason to believe anything in there is
19 deficient. As a matter of fact it's been
20 quite exhausting.

21 BY MS. DELGADO:

22 Q. Right. So, again, because none of the
23 answers have been responsive to the question. I'll
24 try one more time.

25 In your belief do you have the



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1 information and knowledge sufficient to answer for
2 and speak on behalf of the campaign on all of the
3 topics listed in the notice?

4 MR. BLUMMETTI: Same objection.

5 THE WITNESS: The word that I'm
6 getting hung up on a little bit is a
7 belief. I can tell you what I've done.
8 And I'm very happy to tell you what I've
9 done. And I also can say that I have no
10 reason -- that what I've done has been
11 quite exhaustive and I have no reason to
12 think I will not be able to fully answer,
13 you know, appropriate questions about those
14 topics. But there's no way that I can know
15 that until I'm asked.

16 BY MS. DELGADO:

17 Q. Okay. I'm going to object to that
18 again as nonresponsive, but we'll leave that for a
19 later date to handle.

20 Okay. Let's -- who prepared you for
21 this deposition Mr. Binnall?

22 A. Mr. Blummetti.

23 Q. Who else?

24 A. Me. At that point I took various
25 reasonable efforts in order to prepare for this

1 deposition, and including speaking with a vendor
2 that houses much of the documents from the relevant
3 time frame and asked them questions and had them
4 inference run some searches. But all the other
5 actions that I took were just me, other than
6 talking to Mr. Blummetti.

7 Q. Okay. So who is the vendor you spoke
8 to you said?

9 A. 2M.

10 Q. I'm sorry?

11 A. 2M.

12 Q. 2M. Thank you.

13 You stated earlier that it's your
14 belief that the 2016 campaign is a different entity
15 from the current campaign; is that correct?

16 MR. BLUMMETTI: Objection to form.

17 THE WITNESS: I think I said that it
18 is a different entity.

19 BY MS. DELGADO:

20 Q. I'm sorry?

21 A. I think I said that it is a different
22 entity.

23 Q. Okay. So could you explain to me how
24 then Mr. Blummetti was the one preparing you if Mr.
25 Blummetti never worked for the 2016 campaign



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1 effort?

2 **A.** My understanding is that Mr. Blummetti
3 is counsel for the campaign in this case. And when
4 I say the campaign, I mean the entity that was
5 formerly known as Donald J. Trump for President,
6 Inc.

7 **Q.** And your belief is that's that 2016
8 campaign or the current one given that you thought
9 they're different entities?

10 MR. BLUMMETTI: Objection to form.

11 THE WITNESS: Donald J. Trump for
12 President, Inc. was the campaign and again
13 2016 and 2020.

14 BY MS. DELGADO:

15 **Q.** Sorry, you cut out. Can you repeat
16 that, sir?

17 **A.** Yes, ma'am. Donald J. Trump for
18 President, Inc. was the campaign entity in --
19 during the 2016 campaign and the 2020 campaign.
20 That's my understanding.

21 **Q.** Who did you speak to -- I believe you
22 said it, but I want to be clear -- in preparation
23 was Mr. Blummetti and you spoke to 2M, the vendor.
24 Anyone else you spoke to?

25 **A.** No.



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1 **Q.** Why not?

2 **A.** Because I was able to conduct the
3 relevant research in order to answer the questions
4 in the topics by those discussions. And like I
5 said, the campaign no longer has employees and only
6 has a single officer. And the only thing I would
7 have been able to get from the single officer was
8 campaign financials that I was able to get from the
9 Federal Election Commission directly.

10 **Q.** Was there anything stopping you from
11 reaching out to former employees?

12 MR. BLUMMETTI: Objection to form.

13 BY MS. DELGADO:

14 **Q.** I'll rephrase it --

15 **A.** Other than the fact that many of them
16 are represented by counsel --

17 **Q.** Mr. Binnall, I'll rephrase. I'm
18 sorry. I'll rephrase it, Mr. Binnall.

19 Did you reach out to former employees?

20 **A.** No, I did not.

21 **Q.** Why not?

22 **A.** Many of them are represented by
23 counsel. But more importantly, I didn't need in
24 order to answer the -- answer the questions that
25 were designated in this deposition.

1 **Q.** When you say it's because in part many
2 of them are represented by counsel, to whom are you
3 referring?

4 **A.** Oh, I don't know, ma'am. You'd have
5 to ask the specific people that. I think -- no, I
6 don't know.

7 **Q.** Well, I'm asking you because you
8 implied you would have reached out to former
9 employees but for their being represented by
10 counsel. So I'm asking you who you thought of.

11 **A.** Ma'am, if that was the impression,
12 then let me correct that. There is no reason for
13 me to reach out to anyone else. I was able to
14 answer all the questions that you designated
15 without reaching out to former campaign employees.

16 **Q.** Mr. Binnall, are you a supporter of
17 Mr. Trump? Do you support his candidacy for 2024?

18 **A.** Yes.

19 **Q.** Okay. And you mentioned earlier that
20 you looked at records.

21 **A.** Yes, ma'am.

22 **Q.** Which records if you could specify did
23 you review?

24 **A.** Yes, ma'am. I reviewed e-mails, a
25 number of e-mails that -- from both the 2016 and in

1 some cases the 2020 campaign. I also reviewed
2 e-mails that have been produced in -- in -- I'm
3 sorry, records that have been produced in discovery
4 in this case.

5 I have reviewed some of the pleadings
6 in this case and some of the depositions. And I've
7 also seen your personnel files, at least portions
8 of it.

9 **Q.** Why did you review the pleadings?

10 **A.** To understand the full breadth of the
11 information in this case. And because -- yeah, in
12 order to thoroughly be able to answer your
13 questions.

14 **Q.** What depositions did you review?

15 **A.** Not in full, but I reviewed much of
16 the depositions of Mr. Priebus and Mr. Spicer.

17 **Q.** Did you review mine?

18 **A.** I reviewed parts of yours.

19 **Q.** Any others?

20 **A.** No, ma'am, not that I can recall.

21 **Q.** Sorry, go ahead.

22 **A.** Yeah. No, ma'am.

23 **Q.** Okay. Any other depositions from any
24 other cases?

25 **A.** No, not in anticipation for this.

1 **Q.** When you say not in anticipation for
2 this, you have reviewed depositions?

3 **A.** Ma'am, I've probably reviewed hundreds
4 of thousands of depositions in my career.

5 **Q.** I should have been more specific.

6 **A.** Yes.

7 **Q.** Anything related to the individuals --
8 let me be even more specific.

9 Anything related to me, any other
10 depositions from any other matter?

11 **A.** No, ma'am.

12 **Q.** Okay. And you've reviewed records
13 produced in discovery in this matter you said?

14 **A.** Yes, ma'am.

15 **Q.** Both plaintiff and defendants?

16 **A.** I believe so, yes. I think I have
17 certainly focused my review of documents produced
18 by the campaign. Those are the ones I reviewed in
19 the most detail. And I certainly didn't review
20 every single document, but I was able to conduct a
21 number of searches in order to review documents
22 that would be likely to be responsive to this
23 deposition.

24 **Q.** You said you reviewed e-mails from the
25 2016 and 2020 campaign, but not the 2024 campaign,



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1 correct?

2 **A.** Correct.

3 **Q.** Why is that?

4 **A.** I don't have access to those.

5 **Q.** Okay. And on what do you base -- you
6 stated earlier the 2016 campaign was a different
7 entity and then said 2016 and 2020 were the same
8 entity. Could you clarify that for me?

9 **A.** What would you like clarified?

10 **Q.** Did you mean the 2016 campaign was
11 distinct from 2020 or that 2016 and 2020 are
12 distinct from 2024?

13 **A.** Ma'am, the 2016 and 2020 campaigns
14 were known during the time as Donald J. Trump for
15 President, Inc. That entity is now known as "Make
16 America Great Again Act". The 2024 entity is
17 completely different.

18 **Q.** Okay. Sorry. I'm very -- my
19 handwriting is slow these days. We don't handwrite
20 nearly as much anymore as we used to.

21 **A.** I can understand.

22 **Q.** So bear with me. Okay. So let's get
23 into some of the topics then, please. I'm sure
24 you've probably -- if you have -- let's see we're
25 at 11:00 a.m. so if you -- we're good. If you

1 don't need to take a break -- or do you want to
2 take a break before we start topics?

3 **A.** No, ma'am.

4 **Q.** Okay. Great. Okay. So for -- and to
5 speed things up for each of these, I don't need to
6 ask you I presume to whom you spoke to because I
7 gather from your earlier question that for each of
8 these the individual you spoke to would only be
9 Mr. Blummetti, correct? And the vendor?

10 **A.** And the vendor, correct.

11 **Q.** Correct. Okay. So that will speed
12 things up.

13 Okay. So Number 1, Mr. Binnall, it
14 reads: Defendant's document retention policies
15 generally and as applied to records.

16 Okay. Could you speak to me or tell
17 me about how the 2016 campaign stored documents,
18 particularly e-mails?

19 MR. BLUMMETTI: Objection to form.

20 You can answer.

21 BY MS. DELGADO:

22 **Q.** Okay. I'll rephrase. I'll rephrase
23 it.

24 What was the process for the 2016
25 campaign's storage and retention of e-mails?

1 **A.** Ma'am, the campaign did not have a
2 written policy, but reasonable steps were taken to
3 preserve documents once there was notice of
4 dispute. This includes retaining documents that
5 were on the campaign server, most of which
6 consisted of e-mails.

7 **Q.** And were all those e-mails stored with
8 2M?

9 **A.** All those e-mails are now housed with
10 2M. They may have initially been imaged by -- by
11 someone else, but 2M is the one who now houses
12 those e-mails.

13 **Q.** Okay. And you spoke to 2M about their
14 document retention of the Trump Campaign e-mails?

15 MR. BLUMMETTI: Objection.

16 THE WITNESS: I -- sorry.

17 MR. BLUMMETTI: That's okay. Go
18 ahead.

19 THE WITNESS: I did talk to them about
20 their -- their storage of those e-mails,
21 correct.

22 BY MS. DELGADO:

23 **Q.** Okay. Were any reservations expressed
24 by 2M regarding failures in the retention process?

25 **A.** No, ma'am.



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1 **Q.** Any reservations expressed of any
2 kind?

3 MR. BLUMMETTI: Objection to form.

4 BY MS. DELGADO:

5 **Q.** By 2M?

6 **A.** Can you be more specific?

7 **Q.** Yeah. Did 2M express any reservations
8 to you about the custodial chain for instance or
9 any other concerns regarding the documents provided
10 to them?

11 **A.** No, ma'am.

12 **Q.** Okay. Could you tell me about the
13 campaign's policies and procedures for receiving,
14 investigating and resolving complaints of sexual
15 harassment or any kind of discrimination?

16 MR. BLUMMETTI: Objection to form. If
17 you can clarify the time period.

18 BY MS. DELGADO:

19 **Q.** Sure. Let's do 2015 and 2016.

20 **A.** There are no written procedures for
21 investigations. The campaign did engage human
22 resources staff to investigate specific matters
23 however, that department was led by human resources
24 Lucia Castellano.

25 **Q.** When you say the campaign did engage



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1 of HR staff to investigate those matters, is -- do
2 you mean specifically to investigate such matters?

3 **A.** No. I mean that the campaign had a
4 human resources staff and human resources staff
5 would investigate matters of allegations of
6 discrimination for instance or harassment.

7 **Q.** Okay. Thank you for clarifying that.

8 And you say there were no written
9 procedures in place; is that correct? Did I hear
10 you correctly?

11 **A.** That's correct.

12 **Q.** Okay. Were there any -- procedures is
13 often synonymous with policies, but nonetheless,
14 were there any policies in place?

15 **A.** Ma'am, I did search to see if there
16 were any procedures or policies. I was not able to
17 find any. So I believe the answer to that question
18 is, no. There is no written policies and
19 procedures. It was --

20 **Q.** So -- so no one working on the
21 Trump Campaign, to your knowledge -- so let me
22 rephrase?

23 Did anyone working on the Trump
24 Campaign to your knowledge receive any
25 policy or guidelines against sexual



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1 harassment or discrimination?

2 **A.** Not that I was able to locate, ma'am.

3 **Q.** Okay. And you mentioned the campaign
4 had an HR group -- I don't want to put words in
5 your mouth -- an HR staff or a group you said?

6 **A.** I believe there was a staff -- or, I
7 mean, there certainly was a human resources
8 director. It's my understanding that she had at
9 least some staff. I don't know the extent to her
10 staff.

11 **Q.** Do you know if she had any staff at
12 all?

13 **A.** You know what, I don't know for sure.

14 **Q.** Okay. And did you -- you said earlier
15 you didn't speak to anyone but, anyone else beside
16 Mr. Blummetti until now, why did you not reach out
17 to Ms. Castellano?

18 **A.** Ma'am, to answer your question; there
19 I've answered the question that was asked during
20 the reasonable time frame and there was no need for
21 me to speak to Ms. Castellano.

22 **Q.** What -- wouldn't you want to speak to
23 her though to find out if there were any policies
24 you couldn't find regarding such?

25 MR. BLUMMETTI: Objection to form.



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1 BY MS. DELGADO:

2 Q. Well, I'll rephrase. Would you not
3 want to not speak to the HR director regarding this
4 topic?

5 A. Ma'am, I took the steps necessary
6 to find out what information the entity that I
7 have -- that I've been designated for has, and
8 that's what I did. Did not think that any other
9 such conversations was necessary to find out what
10 information the entity has.

11 Q. And the topic called for your -- and
12 I'll quote here for quote "identification of the
13 person responsible for oversight of all such
14 matters at all relevant times here to" unquote?

15 A. Yes, ma'am.

16 "Q. Your position is, if I understand you
17 correctly, that would be Lucia Castellano?

18 A. Yes, ma'am.

19 Q. Okay."

20 MS. DELGADO: And the spelling of her
21 name, for Ms. Boyd's purposes, I believe is
22 C-A-S-T-E-L-L-A-N-O and first name is,
23 Lucia, Ms. Boyd, L-U-C-I-A.

24 BY MS. DELGADO:

25 Q. Is that correct, Mr. Binnall? Did I



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1 get that right?

2 **A.** I'll take your word on spelling.

3 **Q.** Okay. Thank you. So Mr. Binnall, an
4 employee who is facing discrimination, it's your
5 understanding based on your research that there
6 would be no policy or procedure in place to guide
7 that employee?

8 **A.** Other than the best practices of human
9 resources professionals, which is what was filed,
10 was best practices, is my understanding.

11 **Q.** Q. I'm sorry. Can you say that again?

12 **A.** Yeah. It's my understanding that they
13 followed best practices rather than relying on a
14 policies and procedures manual as some entities do.

15 **Q.** And what are best practices, when you
16 use that term?

17 **A.** They're commonly used procedures and
18 principles in the human resources world. And so
19 that is, from my understanding, what was -- what
20 was done and the limits of the policies and
21 procedures in this case -- in this matter.

22 **Q.** So to be clear and understand your
23 point of view, there were no policies and
24 procedures -- no written policies and procedures in
25 place; is that accurate?

1 **A.** That's my understanding.

2 **Q.** Okay. So an employee -- to circle
3 back to my earlier question -- an employee facing
4 pregnancy discrimination or other kind of
5 discrimination had no written policy or procedure
6 to go by, correct?

7 MR. BLUMMETTI: Objection to form.

8 THE WITNESS: As far as I've been able
9 to find, ma'am, that's correct.

10 BY MS. DELGADO:

11 **Q.** So that takes us into Number 3, the
12 policies and procedures used respond to plaintiff's
13 claim of pregnancy discrimination and applicable
14 decision makers. Don't want to waste time today,
15 so is it correct to say that there were no policies
16 and procedures used to respond to my claim?

17 **A.** There were procedures. And once the
18 campaign was aware of the plaintiff's grievance, it
19 hired an outside firm, Jones Day, to conduct an
20 internal investigation. The firm interviewed
21 witnesses and reviewed documents and
22 communications.

23 **Q.** When was that firm hired?

24 **A.** I believe it was hired either in late
25 in December in 2021 or -- I'm sorry, in 2016 or

1 early in 2017.

2 **Q.** You also said quote "once the campaign
3 was aware" unquote. When was that?

4 **A.** I believe that was December 21st of
5 2016.

6 **Q.** Why do you say it was December 21st?

7 **A.** Because I believe that's the day that
8 an e-mail was sent to us by you. And I think it
9 was at that point that the campaign became aware.

10 **Q.** And it's your understanding that at
11 that point is when an outside law firm was
12 retained?

13 **A.** It was after that point, but I believe
14 shortly after that.

15 **Q.** Do you have it?

16 **A.** That was December 21st, I can -- right
17 before the holidays. I cannot tell you
18 definitively if it was late '21 -- I'm sorry, late
19 '16 or early '17.

20 **Q.** So the topic of the policies and
21 procedures used to respond to my claim, so it's
22 your position that the policy and procedure was to
23 hire an outside firm?

24 **A.** Yes, ma'am, to do an investigation.

25 **Q.** No other policies and procedures?



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1 MR. BLUMMETTI: Objection to form.

2 BY MS. DELGADO:

3 Q. Were there -- I'll rephrase?

4 Were there other policies and
5 procedures?

6 A. At that point especially since this
7 was at such a time that the campaign was then
8 operating on a skeleton staff and had limited
9 people available at all to do anything.

10 Q. Regarding procedures, did anyone reach
11 out to me once the campaign became aware of my
12 pregnancy?

13 A. I -- to be clear, which topic are we
14 into right now?

15 Q. 3.

16 A. So as far as procedures used under
17 Number 3, I did not see any that would require the
18 campaign to reach out to you and I -- for whatever
19 steps Jones Day took to investigate, I do not have
20 access to that.

21 Q. Right. I'm not asking about Jones
22 Day. I'm asking about the campaign. You're saying
23 you didn't see --

24 A. I did not see any e-mails to you
25 regarding your complaint after that date. And at



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1 least not to my recollection for, you know, I've
2 reviewed many, many e-mails over a great deal of
3 time frame. I don't recall any e-mails to you
4 after that date to seek information from you on
5 behalf of the campaign.

6 However, at that point it would likely
7 have been up to Jones Day as being engaged to
8 conduct the internal investigation to do so rather
9 than the skeleton crew left late on the campaign in
10 late December 2016.

11 Q. But you don't recall when Jones Day
12 was retained, correct?

13 MR. BLUMMETTI: Objection.

14 BY MS. DELGADO:

15 Q. Do you -- you stated earlier, you
16 don't recall when exactly Jones Day was retained.
17 You said it could have been as late as January of
18 2017; is that correct?

19 A. It could have been in January, and
20 specifically I bring that up because the 21st of
21 December going into the holidays it would not be
22 unusual at that point for it to be after the
23 holidays were over.

24 Q. But what procedures were there in the
25 interim?

1 MR. BLUMMETTI: Objection to form.

2 BY MS. DELGADO:

3 Q. Was there any procedures in the
4 interim?

5 A. The procedure was to hire an outside
6 firm to conduct an internal investigation. That
7 was the procedure that was used there.

8 Q. That was the only procedure; is that
9 correct?

10 A. As far as -- I had seen that. I mean,
11 going and outsourcing that was the procedure that
12 the campaign used. Especially, again, like I said,
13 the campaign no longer had a full staff, had a very
14 limited skeleton staff.

15 Q. And you stated earlier that you did
16 not see any procedure that reflected any outreach
17 to me; is that correct?

18 A. I did not see such procedure.

19 Q. Why did you not speak to Steve Bannon?

20 A. I did not need to in order to answer
21 the questions that were designated for this
22 deposition.

23 Q. Did you not see that Steve Bannon was
24 one of two individuals I informed of my pregnancy?
25 You referenced the e-mail earlier.



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1 **A.** Correct, yes I did.

2 **Q.** So would it not have been appropriate
3 to contact Mr. Bannon to ask, in terms of the
4 procedures taken and the actions taken, why --
5 whether there was any outreach to me?

6 MR. BLUMMETTI: Objection to form.

7 THE WITNESS: Oh, sorry, go ahead.

8 MR. BLUMMETTI: You can answer.

9 BY MS. DELGADO:

10 **Q.** I'll rephrase it.

11 You -- given that you mentioned
12 earlier my e-mail to Steve Bannon and Kellyanne
13 Conway, why did you not contact Mr. Bannon to
14 ascertain what procedures followed my -- disclosing
15 my pregnancy?

16 **A.** Because, ma'am, I did not need to in
17 order to answer the question on the designated
18 topic.

19 BY MS. DELGADO:

20 **Q.** But Mr. Binnall, you're relying simply
21 on, well, I didn't see any procedure other than
22 involving Jones Day; isn't that correct? You're
23 just going off of what's --

24 **A.** I was going off the communications and
25 documents that I reviewed, yes, ma'am. And to

1 answer the question again, policies and procedures,
2 that's all I needed to answer your question.

3 Q. But procedures include reaching out to
4 a pregnant employee, do they not?

5 MR. BLUMMETTI: Objection to form.
6 Argumentative.

7 THE WITNESS: I can't answer that.

8 BY MS. DELGADO:

9 Q. Okay. I'll rephrase it.

10 Would you agree that procedures can
11 include reaching out to a pregnant employee who has
12 reached out to you?

13 A. Ma'am, procedures could include any
14 number of different things. I can't talk as to
15 what every procedure could possibly be.

16 Q. Of course not, but you referenced an
17 e-mail, a specific e-mail, in which two top level
18 campaign officials were notified an employee was
19 pregnant by her supervisor.

20 So my question is: In terms of your
21 duties, to inform yourself on what policies or
22 procedures were used to respond to that disclosure,
23 why did you not reach out to Steven Bannon and/or
24 Kellyanne Conway?

25 MR. BLUMMETTI: Objection to form.



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1 THE WITNESS: Ma'am, I didn't need to
2 in order to answer the questions.

3 BY MS. DELGADO:

4 **Q.** Yet you take the position that the
5 only procedures and policies you know of are those
6 in the documents; is that correct?

7 MR. BLUMMETTI: Objection to form.

11 BY MS. DELGADO

12 **Q.** Given that you state you couldn't find
13 written policies and procedures, why not ask what
14 unwritten procedures were undertaken?

15 **A.** Ma'am, because I was able to determine
16 what they did, and what they did was hire an
17 outside firm.

18 Q. How do you know that's all they did?

19 **A.** Ma'am, in my research in order to
20 answer the question, that's what my research showed
21 that was done in this case. And I have -- the
22 campaign has no knowledge of anything else that was
23 done.

24 **Q.** So very simple question: So you did
25 not -- is it correct that you did not reach out to

1 Steve Bannon?

2 **A.** Yes.

3 **Q.** Is it correct that you did not reach
4 out to Kellyanne Conway?

5 **A.** Yes.

6 **Q.** Okay. The topic also asked for quote,
7 "applicable decision maker" on that issue. Who was
8 the decision maker in terms of -- in terms of
9 policies and procedures regarding my claim?

10 MR. BLUMMETTI: Objection to form. On
11 behalf of the campaign?

12 THE WITNESS: Mr. Bannon was I believe
13 the CEO of the campaign. Ms. Conway was the
14 campaign manager. At the end of the day any
15 decision makers, again, of course was the campaign
16 general counsel, and so as far as decision makers
17 go probably would rest with those people.

18 BY MS. DELGADO:

19 **Q.** I'm sorry, that last that you cut out.
20 Probably what?

21 **A.** It would probably rest with those
22 people as far as decision makers go.

23 **Q.** Okay.

24 **A.** Obviously, we've talked about Lucia
25 Castellano was the human resources director. She

1 certainly has decision making authority in a number
2 of matters as well as the human resources director.

3 **Q.** Did you reach out to her?

4 **A.** No, ma'am.

5 **Q.** Okay. Topic Number 4 is quote "any
6 and all claims of sexual harassment, or for
7 unlawful discrimination, or for pregnancy
8 discrimination against Donald Trump for President
9 or employees represented there of" unquote.

10 Could you please tell me what
11 claims -- what aforementioned -- I won't have to
12 repeat that mouthful again unless you'd like me
13 to -- the campaign has faced, and please tell me if
14 you're referring to 2016, 2020 and if you're not
15 including 2024?

16 **A.** Yes, ma'am. The campaign is currently
17 aware if HR complaints regarding the following
18 individuals for the 2016 presidential cycle: Alba
19 Johnson, Jessica Denson, Elizabeth Davidson, A.J.
20 Delgado.

21 **Q.** I'm sorry. Could you -- it's
22 complaints against the campaign from these
23 individuals you said?

24 **A.** The campaign is currently aware of HR
25 complaints regarding the following individuals for



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1 the 2016 presidential cycle, and that's: Alba
2 Johnson, Jessica Denson, Elizabeth Davidson, A.J.
3 Delgado.

4 **Q.** What was the third name you said, I'm
5 sorry?

6 **A.** Elizabeth Davidson.

7 **Q.** And could you tell me about those,
8 please? We can go one by one if you'd like.

9 **A.** I can tell you what the information
10 that I have is in the public record.

11 Ms. Johnson made a claim against Mr.
12 Trump.

13 Ms. Denson made a complaint against
14 you and one other individual, and I can pull up the
15 other individual's name.

16 Ms. Davidson made a -- was in Iowa,
17 and since made a gender discrimination claim.

18 And Ms. Delgado, yourself, made the
19 complaint that is at issue here.

20 **Q.** Who was Ms. Davidson's complaint
21 about?

22 **A.** You and one other individual. I
23 can --

24 MR. BLUMMETTI: Did you hear the
25 question correctly there?

1 THE WITNESS: Who is Ms. -- I'm sorry?

2 MR. BLUMMETTI: Could you repeat that,
3 Ms. Delgado? I don't think he heard you correctly.

4 BY MS. DELGADO:

5 Q. Who was -- it's a name I've never
6 heard of so I asked -- who was Ms. Davidson's
7 complaint about?

8 A. I apologize, I was answering the wrong
9 individual and I heard you incorrectly.

10 Ms. Davidson's complaint was about
11 gender discrimination. I was not able to locate a
12 particular individual that it was about, but it
13 was -- it had to do with allegations of gender
14 discrimination I believe, leading up to the Iowa
15 caucuses in 2016. She later dismissed -- that
16 ended up not filing any lawsuit in that claim. But
17 it had to do with, you know, whether males and
18 females were treated alike.

19 Q. Okay. Were there any HR complaints by
20 any males?

21 A. Not that I was able to find.

22 Q. Okay. And you mentioned these were
23 for 2016 --

24 A. Yes, ma'am.

25 Q. -- what about 2020?



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1 **A.** Ma'am, for the relevant time frame
2 here, I looked at 2016.

3 **Q.** Why?

4 **A.** Because of the rather huge amount of
5 documents that would have to be sifted through in
6 order to go beyond that. This campaign was about
7 the 2016 cycle and so the 2016 presidential
8 campaign and so that is the search I did for -- to
9 do a reasonable and diligent inquiry.

10 **Q.** Why do you think this campaign is tied
11 to a presidential cycle -- this lawsuit is tied to
12 a presidential cycle, I should say?

13 **A.** Had to do with allegations regarding
14 the 2016 presidential campaign, which had a
15 completely different staff from any other campaign.

16 **Q.** On what do you base that it had a
17 completely different staff?

18 **A.** Well I should say a different
19 hierarchy. Like for instance, Mr. Bannon was not
20 the CEO of the 2020 campaign. Ms. Conway was not
21 the campaign manager of the 2020 campaign, et
22 cetera. And so, because there are so many hundreds
23 of thousands of -- actually I apologize, millions
24 of documents in order to get to do a reasonable
25 search to answer your question, that is what I did.



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1 **Q.** Who was the HR director in that 2020
2 campaign you mentioned?

3 **A.** Ma'am, I couldn't tell you off the top
4 of my head.

5 **Q.** Mr. Binnall, couldn't you just call
6 whoever -- call or e-mail whoever the HR director
7 was for 2020 and ask them what the complaints were?

8 MR. BLUMMETTI: Objection to form.

9 THE WITNESS: Ma'am, I don't think
10 that was a designated question. And as far as the
11 reasonableness for what I did to prepare for
12 today's deposition, I took the reasonable steps.

13 BY MS. DELGADO:

14 **Q.** So just to be clear, you did not
15 inquire or research and you cannot answer today as
16 to any complaints made in the 2020 cycle of the
17 campaign; is that correct?

18 **A.** That's correct.

19 **Q.** Jason Miller was part of both
20 campaigns; is that correct?

21 MR. BLUMMETTI: Object to form.

22 BY MS. DELGADO:

23 **Q.** Was Jason Miller part of both
24 campaigns in 2016 and 2020?

25 **A.** Ma'am, what topic are we under right

1 now?

2 Q. We're still on 4.

3 A. Ma'am, that's not a question that I
4 looked into to answer Question Number 4 and so I
5 can't answer on behalf of the campaign that
6 question.

7 From my personal recollection, I
8 believe that he was. That's my personal
9 recollection, not on behalf of the campaign.

10 Q. Right. The reason I bring that up is
11 because you, yourself, mentioned that the staff was
12 quote "completely different" in 2016 and 2020. So
13 I'm trying to work through that, but you stated
14 Jason Miller was on both. Was Brad Parscale on
15 both 2016 and 2020?

16 A. Ma'am, again, that wasn't a designated
17 topic so I can't speak on behalf of the campaign.
18 But for my personal recollection the answer is yes.

19 And I should have been more clear in
20 that original answer that there were individuals
21 that were on both campaigns. I was speaking more
22 as the campaign hierarchy.

23 Q. Was Kellyanne Conway on both
24 campaigns?

25 A. Wasn't a designated question, and I do



1 not believe that she had an official position in
2 the 2020 campaign. I believe she was still in The
3 White House at the time, that's my personal
4 recollection.

5 MS. DELGADO: My alarm went off, it's
6 time for the Door Dash. So if now would be a good
7 time for a five-minute break, get some water,
8 whatever you'd like to do, if that's okay with
9 everybody -- ten minutes?

10 MR. BLUMMETTI: That's fine.

11 MS. DELGADO: Okay. Thank you.

12 (Thereupon, a break was taken from
13 11:46 to 11:57 a.m.)

14 BY MS. DELGADO:

15 Q. Okay. So back on the record. I
16 believe we were on Number 4, Mr. Binnall.

17 A. Yes.

18 Q. Okay. So were there any claims of
19 sexual harassment that you found in the 2016
20 campaign?

21 A. I'm not sure how Ms. Johnson
22 designated her complaint, and I think she
23 characterizes it as an unwanted physical advance.
24 And then -- yeah.

25 Q. Okay.



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1 **A.** That and it -- depending how you would
2 designate your complaint, those were the two I was
3 able to identify.

4 **Q.** And when you searched for these, did
5 you limit it to formal complaints, or did you
6 include any type of, for instance, e-mail
7 expressing concern about something?

8 **A.** Ma'am, there's no way for me to limit
9 it as far as e-mails expressing concerns because
10 there was millions and millions of e-mails so I was
11 not able to do that. But I -- those were the
12 complaints that were made to HR that I'm aware of.

13 **Q.** Did you perhaps consider conducting a
14 keyword search or --

15 **A.** I did conduct a keyword search in a
16 number of ways, and even myself, and so those are
17 what I was able to find.

18 **Q.** What key words did you use?

19 **A.** Well, I did run searches, such as --
20 and ask that searches be run for things such as
21 harassment and sexual harassment, but the problem
22 is in presidential campaign those phrases were used
23 a lot, you know. It was used for instance in
24 discussing the issues with Hilary Clinton and
25 allegations, you know, made about what she did or



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1 didn't do regarding her husband's time in The White
2 House.

3 So it -- just a simple keyword search,
4 wasn't able to limit it so I was able to identify
5 those four. I was not able to identify anything
6 else beyond the four.

7 Q. When you do the keyword search and you
8 say millions would come up, rightly so for the term
9 sexual harassment --

10 A. No, ma'am. No, ma'am. I didn't say
11 millions would come up on that.

12 Q. Oh, you're right. Let -- let me
13 rephrase it, you're correct. There are a millions
14 of documents --

15 A. Millions of documents, that's --
16 that's correct.

17 Q. Right. Did you consider limiting the
18 keyword search to e-mails sent to Lucia Castellano
19 for instance?

20 A. I did look through a number of her
21 e-mails. I don't know if I did a word search based
22 on hers, but again, that's usually when -- when
23 somebody goes directly to human resources on that,
24 that was -- that's what I was looking for. Those
25 are the four that came up. I did not find any --



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1 anything else other than those four that I believe
2 was responsive to the question and it --
3 specifically as to claims if sexual harassment or
4 for unlawful discrimination or for pregnancy
5 discrimination. So I was looking specifically for
6 claims and those were the claims I was able to
7 identify.

8 Q. How do you define claims?

9 A. I probably would use a dictionary
10 definition for claims. And so I can pull that up,
11 but I mean, when I'm looking for claims, I'm
12 looking for someone saying, you know, that -- that
13 somebody, that they -- that they were a victim of
14 some sort of harassment, as you identified in your
15 question, and what actions the campaign then took
16 at that point. Those were the four I was able to
17 identify.

18 Q. Fair enough. And I just wanted to
19 clarify that you weren't taking the term -- you
20 weren't interpreting the term claims to mean a
21 legal claim was made. It sounds like you used the
22 broader --

23 A. Right. I didn't require that a
24 lawsuit be filed or a Title 7 would have to be
25 filed.

1 **Q.** Okay. Great. That's what I was
2 looking to clarify.

3 So to be clear, now working through
4 the answer you gave, did you read through the
5 e-mail, all e-mail -- obviously, not all e-mails
6 sent to Lucia, but you did run a keyword search in
7 all e-mails to and from Lucia Castellano?

8 **A.** No, ma'am, I didn't -- I didn't do a
9 keyword search for everything regarding her. I
10 looked specifically for claims and worked with our
11 vendor to do just that, and went through a number
12 of relevant e-mails, and that's what my search was
13 able to -- to discover.

14 **Q.** Right. But I'm trying to find out
15 what the search was that you executed because you
16 stated that using the term sexual harassment would
17 bring up too many results, rightly so. But you
18 also did not read through all e-mails sent to and
19 from Lucia. So what search did you run exactly?

20 **A.** Ma'am, I actually couldn't tell you
21 the exact searches that I did. But what I was able
22 to do, and I wouldn't even be on this campaign
23 e-mails, I researched publicly available sources on
24 this as well, is identified the particular, you
25 know, the particular individuals that people make



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1 claims. Those were the only four claims I was able
2 to find.

3 Q. But -- and so your position -- your
4 testimony today is you can't recall the keyword
5 search, if you ran any keyword search, that --

6 A. I can tell you I ran a number of
7 keyword searches. And I can't tell you off the top
8 of my head exactly what keyword searches, that of
9 course was not a designated topic here. But I
10 believe these were -- my understanding is that this
11 is all information that was turned over in
12 discovery as well.

13 So I tried to go through that
14 documentation as efficiently and effectively as I
15 could, and that's what I was able to determine.

16 Q. On what do you base that the keyword
17 search is not responsive or part of Topic Number 4?

18 A. It didn't ask me to run specific
19 keyword searches. And so what I did is, I tried
20 to -- tried to think best I could the best way to
21 come up with information that would be responsive,
22 and I did that for those four individuals. I did
23 that and it turned out for those four individuals.
24 Both documents that I found in the -- in the -- in
25 the e-mails at issue and on publicly available

1 sources.

2 Q. You're saying Number 4 would have to
3 specifically ask you to run a keyword search for
4 you to --

5 A. Ma'am -- go ahead.

6 Q. You're saying that Topic Number 4
7 would have to, specifically, ask you to run a
8 keyword search for you to testify here today what
9 the keyword search was that you ran to inform
10 yourself as to Number 4?

11 A. No, ma'am. I'm saying Number 4
12 doesn't require me to do a keyword search or not.
13 You know, I was required to use my best efforts to
14 try to come up and be able to answer your
15 questions, and that is exactly what I did. And I
16 was able -- I was able to identify four specific
17 examples. And those were the -- and that's --
18 yeah, and so that's what I was able to find using
19 my best efforts.

20 It didn't, you know, for instance,
21 Number 4 doesn't say, or nor do the instructions
22 say, to use specific keywords in order to do
23 searches in order to find those. So what I did is,
24 as I've explained, is I've gone through e-mails. I
25 went through the document production and I looked

1 at publicly available searches in order to come up
2 with that. And that's what I was able to come up
3 with.

4 Q. And you correctly say it doesn't
5 require you to run a keyword search, but you also
6 say you understand that your best efforts are
7 required.

8 A. Yes, ma'am.

9 Q. Yet you don't believe that best
10 efforts would entail speaking to the HR director,
11 who is still alive as far as I know and available
12 somewhere?

13 MR. BLUMMETTI: Objection.

14 THE WITNESS: Ma'am, in order to
15 answer your question, I didn't need to do that.

16 BY MS. DELGADO:

17 Q. Right. This is a new question.

18 When you referenced your expectation
19 that you used your best efforts to educate yourself
20 on these topics, you -- is your belief is that the
21 best efforts do not include speaking to the HR
22 director?

23 A. Ma'am, as I think I have already
24 testified to, I -- in order to answer the questions
25 that you put in your designated topics, I did not



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1 have to do that. And it was -- it just wasn't
2 necessary for me to be able to answer -- to find
3 the answer to the designated topic. That's what I
4 did, didn't require going and talking to individual
5 people.

6 Q. Even though you mentioned yourself
7 that these are millions of e-mails to go through,
8 including millions of e-mails, which will give
9 false positive results on terms like sexual
10 harassment. Even still, you don't think best
11 practice would be to speak to the HR director?

12 A. Based on the designated topic, no.

13 Q. Okay. Let's move onto Number 5.

14 A. Okay.

15 Q. Oh, and I'm sorry, just to clarify.
16 For Number 4, I presume, but just to clarify, your
17 answer would be that you also, same as Number 3,
18 did not look at the 2020 campaign, correct, 2020
19 campaign effort?

20 A. Correct. As a matter of fact, I think
21 that question regarding 2016 and 2020, I think I've
22 already answered, I think that was in regards to
23 Question 4.

24 Q. Right. So to speed things up, for all
25 of the topics, the answers you're giving are

1 strictly about the 2016 campaign effort and not
2 2020?

3 **A.** Not necessarily. There may have been
4 at least one question that where a reasonable
5 search could and was done on 2020. And so if a
6 reasonable search could be done then at that point
7 it was specifically asking for that information
8 that I did it.

9 **Q.** Okay. So for Number 5, it was -- that
10 was 2016 and 2020 that you looked at or 2016 only?

11 **A.** Correct. That was the 2016 campaign.
12 So for Question Number 5, I can tell you that the
13 campaign structure was often fluid and it changed
14 over time. From August 2016 to until November 2016
15 the campaign hierarchy was as follows: Steven
16 Bannon was the chief executive officer. Jeffrey
17 DeWit was the chief operating officer and chief
18 financial officer. Kellyanne Conway was the
19 campaign manager. David Bostein was executive
20 campaign manager. Lucia Castellano was the
21 director of human resources.

22 **Q.** And when you say Lucia Castellano was
23 the director of human resources, can you identify
24 when and via what medium staff members were
25 informed this is the HR director and we have an HR

1 director?

2 **A.** Ma'am, under what question are you
3 asking me to answer that question?

4 **Q.** Regarding the organizational
5 structure, I'm asking you, it's part of that, if
6 employees, staffers, team members were aware of
7 this organizational structure?

8 **A.** Ma'am, I -- because that question was
9 not -- was not part of a designated question, I did
10 not research that particular topic. And so I'm not
11 able to answer that question on behalf of the
12 campaign, and I don't have any personal knowledge
13 of that.

14 **Q.** Okay. So then I'll ask it in regards
15 to Questions Number 2 -- Topics 2, 3 and 4. It
16 falls under all and each and every one of 2, 3 and
17 4, its policies and procedures.

18 What --

19 **A.** Ma'am, my answer would not change.
20 I'm not aware of any policy or procedure that
21 included telling individual employees about the
22 human resources director. And so because there's
23 no policy or procedure on that, I did not see any
24 information that would be relevant to that.

25 MR. BLUMMETTI: Objection to the



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1 extent the question calls for any information
2 beyond those topics noticed, but I believe Mr.
3 Binnall answered.

4 MS. DELGADO: Well, we're talking
5 about the policies and procedures for receiving,
6 investigating or resolving complaints. I'm quoting
7 from Number 2 for instance, part of any such policy
8 and procedure would be informing the staff that
9 there is an HR director.

10 MR. BLUMMETTI: That's where the
11 objection comes. We --

12 MS. DELGADO: Mr. Blummetti, your
13 objection is what? I'm sorry, can you clarify?

14 MR. BLUMMETTI: The extent that the
15 question you asked Mr. Binnall, I believe one
16 question ago, falls outside of the scope of the
17 noticed topics, that's it. I'm asking him not to
18 answer the question. I'm just preserving the
19 objection for the record.

20 MS. DELGADO: Okay. Thank you.

21 BY MS. DELGADO:

22 Q. Mr. Binnall, I'm taking you back to
23 Number 2, which is the campaign's quote "policies
24 and procedures for receiving/investigating a
25 resulting complaint." Focusing particularly on the



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1 receiving, were the staff members of the 2016
2 campaign informed -- did you see any point where
3 they were informed there is an HR director, her
4 name is Lucia Castellano?

5 **A.** Ma'am, I'm not aware of any procedure
6 that would require that. And I'm not aware of that
7 being part of the procedures at all. And that's
8 what I researched, and I did not find that
9 procedure.

10 **Q.** Okay. Before I have to object to that
11 as nonresponsive, let me try again.

12 I'm not asking if you're aware of
13 whether the procedures require that. I'm saying as
14 far as your knowledge regarding policies for
15 receiving complaints, were the staff members
16 informed where complaints could be received or
17 through whom?

18 **A.** I am not aware of any policy regarding
19 how employees were to make complaints and to whom
20 they were making them.

21 **Q.** Again, not asking you about if there
22 was a policy regarding informing them. Were they
23 informed? It's part of the policy, there isn't a
24 separate policy on that, it would be part of the
25 policy for receiving complaints.

1 **A.** Ma'am, I looked at what the policies
2 and procedures were, that's what the topic asked me
3 to look at, and that's what I looked at. I'm not
4 aware of any such policies and/or procedures.

5 **Q.** Right. So for the policies and
6 procedures of the campaign, was there anything in
7 there therein stating, informing the staff there is
8 an HR director?

9 **A.** Ma'am, as I've testified to you
10 already, I'm not aware of any such policies and
11 procedures. And I did look for such. I was unable
12 to find it.

13 **Q.** Maybe you misheard my question. I'm
14 not asking if there was a policy and procedure.

15 Did you see an e-mail notification or
16 any type of notification informing the staff that
17 there is an HR director and her contact
18 information?

19 **A.** Ma'am, that was not part of the
20 designated topic. I did not look for it.

21 **Q.** It's part of policies and procedure in
22 Number 2.

23 **A.** Ma'am, for policies and procedures I
24 looked for policies and procedures. I did not look
25 for every communication with an HR director, for



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1 instance, or every director, every communication
2 from all employees regarding HR directors.

3 I looked for policies and procedures.
4 That's what the topic asked for, that's what I did.

5 Q. Mr. Binnall, are you saying an HR
6 policy and HR procedure does not entail notifying
7 staff that the HR department exists; is that your
8 testimony today?

9 A. It could be a policy or procedure.
10 I'm just saying that I was unable to find that as a
11 policy or procedure. And --

12 Q. I'm not asking if you found it as a
13 policy or procedure. I'm asking if you found such
14 a notification, which would be part of the policy
15 or procedure?

16 A. Ma'am, that is not what -- part of
17 what I looked for in this case. And I do not
18 believe it was part of the designated topics.

19 Q. I'm not asking if that's part of what
20 you looked for or if you believe it's part of the
21 designated topics.

22 I'm asking did you see any such
23 notification regarding there being an HR director
24 and her contact information?

25 A. Object to what I said, that's not

1 something that I looked for based on the designated
2 topics, the answer to your question is no.

3 Q. Okay. I'll object to that as
4 nonresponsive.

5 You stated earlier that --

6 MS. DELGADO: Sorry Mr. Blummetti, did
7 you say -- I thought I heard something. Was there
8 an --

9 MR. BLUMMETTI: You objected as
10 nonresponsive. I said, I believe that the record
11 speaks for itself, including Mr. Binnall's answers.

12 MS. DELGADO: Oh, okay. I couldn't
13 hear you.

14 BY MS. DELGADO:

15 Q. I'm sorry, there's a note here I'm
16 trying to find.

17 Number 5, Mr. Binnall, wasn't in
18 general the organizational structure, it was for
19 reporting complaints or allegation for sexual
20 discrimination; correct?

21 A. Correct -- yes.

22 Q. Okay. And I believe you gave me your
23 organizational structure in general of the
24 campaign. So would you like me to ask it again?

25 A. Well, so I think there might be some



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1 confusion here about these -- the conjunction here.

2 I see the organizational structure of DTP, which
3 I'm taking that particularly is Donald Trump for
4 President, administration and chain of reporting.

5 So for the chain of -- so for the
6 administration, that's -- best I could answer was,
7 that hierarchy for the chain of reporting. As far
8 as I've been able to determine, like I said, there
9 are no policies and procedures per se. There was a
10 human resources director. And I believe all such
11 complaints would go to the human resources
12 director, Lucia Castellano. She was certainly
13 subject to the campaign manager and the chief
14 executive officer.

15 Q. So the chain of reporting for a
16 complaint, your answer would be Lucia Castellano?

17 A. Yes, ma'am. And then where she --
18 certainly there was nothing prohibiting people from
19 going to another campaign official, but there was
20 no policy or procedure talking about going up the
21 ladder, if you will.

22 Q. Sure. So when we speak of a chain,
23 was her contact information disclosed or shared
24 with staff at any point?

25 A. Sorry, go ahead.

1 **Q.** I'm waiting.

2 **A.** I do not know what question that would
3 be subject to, what particular topic that would be
4 questioned -- that would be subject to. Can you
5 point me to it?

6 **Q.** The chain of reporting, Mr. Binnall?

7 **A.** Ma'am, I did not look for chain of
8 reporting as to know what her phone number was or
9 who her phone number was -- was distributed to by.
10 I do not have that information.

11 **Q.** I don't believe I said phone number.

12 **A.** I'm sorry.

13 **Q.** I can re-ask it.

14 **A.** Please do.

15 **Q.** When you speak of, quote "the chain of
16 reporting" in Number 5, we speak of a chain, were
17 the staff members ever informed as to Lucia
18 Castellano's existence of being HR director?

19 **A.** Oh. Again, that's not a question that
20 I -- that I researched specifically, but it was not
21 something that was specifically designated. So the
22 campaign does not have -- is not able to answer
23 that question. And I have no personal knowledge.

24 **Q.** Okay. I'm objecting because it's not
25 really responsive, Mr. Binnall, what you

1 researched. You're here because you have taken a
2 position of the campaign that you can speak to
3 these issues. So when you say, well, I didn't look
4 into them, I'm going to object to that as
5 nonresponsive.

6 Let me ask again: The chain of
7 reporting, what -- when we speak of a chain, when
8 were -- was the staff in what format notified that
9 there is an HR director in that chain?

10 MR. BLUMMETTI: Objection. Asked and
11 answered.

12 THE WITNESS: Ma'am, I believe as I
13 have already testified to, there is not a policy
14 and procedure that would require that. And nor do
15 I have any information as to any whether such a
16 policy or procedure about notifying staff of that
17 chain -- chain of reporting happened.

18 There -- like I said, as far as what
19 I've testified to, there was no such policy or
20 procedure about giving the staff a chain of
21 reporting.

22 BY MS. DELGADO:

23 Q. Okay. So your answer is no?

24 A. My answer is is that there was no
25 policy or procedure that required the -- the

1 disclosure of a chain of reporting. And because
2 there wasn't such a policy or procedure, I did not
3 look into whether there was disclosure of a chain
4 of reporting to specific employees because it was
5 not a designated topic.

6 Q. You're not going to answer whether
7 employees were informed as to Lucia Castellano?

8 A. The reason that you don't like my
9 answer is because -- and I'm trying to be as
10 absolutely straight and clear as I possibly can be.
11 I can only answer questions that were designated,
12 information that was designated. I looked as -- to
13 see whether there were policies and/or procedures.

14 Whether other actions were taken
15 outside of the policies and procedures in this case
16 that did not exist, is not something that was
17 designated. And so it's not something that I
18 looked into. For instance, was there a
19 communication sent out regarding what the chain of
20 reporting is for an HR issue. I've told you what
21 the policies and procedures were and I've told you
22 what the administration was and who was in charge
23 of HR complaints.

24 Q. Mr. Binnall, there's no reference to
25 policies and procedures in Question -- in Topic 5

1 which is what I'm asking you about.

2 **A.** So for Question Number 5 -- Question
3 Number 5 does not include whether campaign staff
4 were given that information.

5 It was -- Question Number 5 says: The
6 organizational structure of DTP's administration
7 and chain of reporting for complaints or
8 allegations of sexual discrimination as it existed
9 each year, 2016 to the present.

10 That's the information that I
11 researched and looked at and that's what I've
12 answered my question as to.

13 **Q.** So your chain, your definition of
14 chain, begins at the receiving end; is that
15 correct?

16 **A.** I'm not sure what you mean.

17 **Q.** I'm going to strike all of that as
18 nonresponsive. It's clear you don't want to answer
19 the question about -- which it falls under Number
20 2, Number 3, Number 4, and Number 5. But we'll
21 move on because we're pressed for time, but I'll
22 just label all of that as nonresponsive to the
23 question posed repeatedly.

24 MR. BLUMMETTI: I believe Mr. Binnall
25 answered the question repeatedly.

1 MS. DELGADO: Sorry, Mr. Blummetti.

2 Go ahead.

3 MR. BLUMMETTI: I would just like the
4 record to reflect that Mr. Binnall's testimony
5 speaks for itself and we believe that he's answered
6 the question.

7 BY MS. DELGADO:

8 Q. Number 6, Mr. Binnall, is plaintiff's
9 employment and performance evaluations and any
10 deficiencies relating to the same or other forms of
11 other random evaluation.

12 Did I have any performance
13 evaluations?

14 A. No, ma'am. As far as I was able to
15 find there was no performance reviews. There was a
16 complaint of harassment by Jessica Denson against
17 you.

18 Q. And you stated that you've looked at
19 public filings including Ms. Denson; correct?

20 A. Yes, ma'am.

21 Q. So you're aware of the campaign's
22 position on Ms. Denson; correct?

23 A. I'm aware of public reporting on it,
24 but I did not look in detail as to what the
25 campaign's position as to what Ms. Denson was and I



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1 have no personal knowledge of it.

2 Q. Number 7 is the process for reviewing
3 campaign staff and recommending current or former
4 staff for White House positions, including
5 identification of those individuals with the
6 decision-making authority in such matters and those
7 individuals made hiring decisions.

8 Did Steve Bannon recommend anyone for
9 a White House role?

10 MR. BLUMMETTI: Objection to form.

11 THE WITNESS: Ma'am, based on the
12 question designated, I did look not as to whether
13 specifically Steve Bannon recommended people for
14 positions. What I was able to determine is that
15 there was no such procedure. All staffing was
16 decided by the presidential transition and not the
17 campaign. Presidential transitions are governed by
18 federal law. The campaign has no independent
19 knowledge of the efforts of the official transition
20 committee.

21 BY MS. DELGADO:

22 Q. Mr. Binnall, how do you know all
23 staffing was decided by the presidential
24 transition?

25 A. Because that's what's required by



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1 federal law.

2 Q. That's -- okay. That's your basis.

3 Okay.

4 Were you aware that the campaign was
5 still paying half of our salaries during that
6 transition period?

7 MR. BLUMMETTI: Objection to form.

8 THE WITNESS: Can you point me to the
9 topic?

10 BY MS. DELGADO:

11 Q. Okay. Let me rephrase it. Why was
12 the campaign paying half our salaries during the
13 transition period?

14 A. Can you, please, point me to the topic
15 under which that question falls?

16 Q. I believe it falls under 7.

17 A. So I have -- based on Number 7, that's
18 not something that we definitely looked into. I do
19 have knowledge that in many instances, although not
20 all, campaign staffers were paid, for instance,
21 till the end of the year. And that was a campaign
22 individual by individual decision.

23 But I have no information about -- my
24 information is that all transition activities were
25 handled by the official presidential transition.

1 **Q.** What federal law is it that you
2 believe required the transition team solely to
3 recommend for The White House?

4 **A.** I don't remember the name of the
5 statute. I do know it was passed I think in the
6 mid 1960's and then revised in, I think, 2015. And
7 that law has a structure, and that structure is --
8 and, by the way, I don't think this is -- I'm
9 speaking on my own personal capacity here -- I'm
10 not sure that this --

11 **Q.** Don't, please don't. Let me stop you
12 there then, please, don't because you're here as a
13 30(b) (6) witness. So we shouldn't mix the two.

14 **A.** I'll take that as an instruction not
15 to answer on my own personal knowledge.

16 **Q.** No. Of your -- the way you mentioned,
17 you, specifically, said, I'm going into my own
18 personal knowledge here as an attorney and you're
19 here as a 30(b) (6) witness on behalf of the
20 campaign --

21 **A.** That's not exactly what I said.

22 **Q.** Okay. Go ahead.

23 **A.** Yeah. So what I can tell you is that
24 you asked for the process of reviewing campaign
25 staff -- process for reviewing campaign staff,

1 recommending current or former staff for White
2 House positions, including identification of those
3 individuals with decision-making authority in such
4 matters, and those individuals who made hiring
5 decisions.

6 And our response to that is that the
7 campaign had no position, there was no such
8 procedure. All staffing was decided by the
9 presidential transition and not the campaign. And
10 as I pointed out, presidential transitions are
11 governed by federal law. Campaign has no
12 independent knowledge of the efforts of the
13 official transition.

14 **Q.** I understand your answer is that it
15 didn't happen because it's contrary to federal law,
16 correct?

17 **A.** My position is there was certainly no
18 such procedure. And that -- yeah, as I said,
19 there's no such procedure. All staffing was
20 decided by the presidential transition, not the
21 campaign.

22 **Q.** So you have no documentation to
23 support that other than because it's against the
24 law?

25 **A.** Well, I also did review documents and



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1 that is what happened. It was presidential
2 transition officials in my review of the relevant
3 documents that were making decisions. And it
4 was -- it was the transition that was hiring people
5 for The White House. There's a procedure for doing
6 that and that procedure was followed.

7 **Q.** But how could you possibly review such
8 documents if you reviewed the campaign's documents?

9 **A.** Because there were people that did use
10 campaign e-mail addresses. And so those -- there
11 were documents with -- that had to do with the
12 presidential transition, and that that was -- that
13 that was very clearly being done. In regards to
14 the transition, there was no action on behalf of
15 the campaign that was being conducted at that
16 point.

17 **Q.** So you're aware, as you just said,
18 that campaign e-mails were still being used during
19 the transition period to conduct White House
20 discussions?

21 **A.** Yes, ma'am.

22 **Q.** Okay. Fair enough. That's in the
23 documents. And you're aware that during the
24 transition period the campaign was paying in part
25 the salaries of the transition staff?



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1 **A.** As I've already testified to, I have
2 no knowledge on behalf of the campaign.

3 **Q.** And did the campaign ever issue a
4 termination letter when the transition period
5 began?

A. Under what topic are we?

7 **Q.** I think it would fall under what you
8 just -- you opened the door to it really with what
9 you just said about the campaign not being involved
10 in transition issue. So I asked of you --

11 **A.** There's nothing designated that I'm
12 aware of about termination letters. I did not look
13 for any.

Q. You didn't see any?

15 **A.** No, ma'am.

16 **Q.** Okay. Fair enough. Did the
17 campaign -- did you ever see any notice for where
18 the campaign is informing its staff to stop using
19 the campaign e-mails immediately?

20 **A.** Ma'am, that wasn't a designated topic
21 as far as I know so I didn't look for it.

22 **Q.** Okay. Again, just going off of what
23 you opened the door to.

Did the Trump campaign NDA remain in effect during the transition period?

1 **A.** Ma'am, that was not a designated topic
2 and I did not look for it.

3 **Q.** Okay. In the lawsuits that you said
4 you reviewed, did you notice that the Trump
5 Campaign NDA was still in effect during this
6 transition period?

7 **A.** Ma'am, it wasn't a designated topic.
8 I didn't look for it. And I have no personal
9 knowledge on that.

10 **Q.** You don't recall the lawsuit against
11 me for 1.5 million for allegedly breaching my Trump
12 Campaign NDA during the transition period?

13 **A.** Ma'am, that wasn't a designated topic.
14 I didn't look for that and I don't have any
15 specific recollection of -- of that.

16 **Q.** Sure. And it isn't a topic. I was
17 wondering based on your -- doing your reading of
18 these lawsuits that have been filed, including
19 mine. But if your answer is you don't recall then
20 that's fine by me.

21 **A.** I didn't see that, no.

22 **Q.** Okay. Would you agree -- and we're
23 still under Number 7 -- that campaign performance
24 was a big driver for obtaining a White House role?

25 MR. BLUMMETTI: Object to form.



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1 BY MS. DELGADO:

2 Q. Is it to work on the drive -- let me
3 ask -- okay.

4 Would you -- was campaign performance
5 a large factor in obtaining a White House job?

6 A. Ma'am, I have no ability to testify
7 what the transition looked at as far as for what
8 they -- what decisions they used in order to make
9 personnel decisions for the White House. That's
10 something you would have to ask the transition.

11 Q. Why didn't the campaign wrap up?

12 MR. BLUMMETTI: Object to the form.

13 THE WITNESS: Yeah, ma'am, what topic
14 are we under here?

15 BY MS. DELGADO:

16 Q. Still going to reviewing of campaign
17 staff and recommending former staff and White House
18 positions?

19 A. Ma'am, I did not look into why the
20 campaign didn't wrap up as -- in researching that
21 topic.

22 Q. We'll come back to 7.

23 Did you look into 8, my qualifications
24 for a position with the campaign?

25 MR. BLUMMETTI: I object to the form.

1 You can obviously answer.

2 BY MS. DELGADO:

3 Q. No, sorry, I didn't mean that to be
4 flippant.

5 A. Ma'am, I have reviewed the plaintiff's
6 personnel file. It did not contain a resume or a
7 CV, but I did look.

8 Q. I have not seen this personnel file
9 that you're referring to. So are -- are you saying
10 there is a personnel file of mine that you
11 reviewed?

12 A. Ma'am, what I'm saying is I've seen
13 documents regarding your -- yeah, and
14 correspondence regarding your -- your employment.
15 It's not what I would probably generally call
16 personnel file, but I -- for instance, I've seen
17 records of the complaint against you. I've seen
18 other e-mail correspondence regarding you. I have
19 not seen and nor was able to locate a CV or a
20 resume.

21 Q. Notwithstanding that you didn't have a
22 CV or a resume to review, did you conduct your own
23 research into my qualifications for a position even
24 via Google?

25 A. You know, I didn't Google you. I did



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1 see a number of references to that you had a past
2 in politics and communication and -- and so that I
3 did see. But I didn't see, you know, anything that
4 would need like a CV or a resume in order to answer
5 the question about, you know, whether you were --
6 your qualifications for your position with Donald
7 Trump for President.

8 Q. So are you able to speak to Number 8?
9 I think you're telling me you're not.

10 A. No, ma'am, I'm telling you what I
11 looked for and I didn't see any specific resume or
12 CV, which is what I would normally look at in order
13 to determine whether somebody is qualified for a
14 position. I didn't see that.

15 As I've told you, you were clearly
16 involved in politics. I have -- there's nothing
17 that I have seen to say that you didn't have the
18 qualifications to be in your current position. But
19 affirmatively being able to say that you were is
20 something that I would -- I would need information
21 that I wasn't able to find in our documents such as
22 a resume or CV.

23 Q. Well, what about in the complaint,
24 which you stated you looked at which has a
25 biographical section, did you find anything there

1 that would be a qualification?

2 **A.** I mean, I -- of course in the
3 complaint in these allegations, and, you know, as
4 to what you alleged in the biographical data, I
5 have, again, no reason to question your
6 qualifications for the position that you had.

7 **Q.** Okay. Number 9 I assume you're going
8 to have the same answer. Let me ask it anyway.
9 The qualifications of the plaintiff and all
10 campaign staff, et cetera, ultimately, did receive
11 White House positions, what were their
12 qualifications?

13 MR. BLUMMETTI: Object to form.

14 THE WITNESS: All staffing was decided
15 by the presidential transition and not the
16 campaign. Presidential transitions are
17 governed by federal law. The campaign has
18 no independent knowledge of the efforts of
19 the official transitions made.

20 BY MS. DELGADO:

21 **Q.** So you did -- that's not what Number 9
22 is about thought, the qualification. I presume you
23 know who went into the White House. You worked on
24 the campaign. The topic is about the
25 qualifications of those individuals.



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1 **A.** Ma'am, I have -- no, the campaign does
2 not have any independent knowledge of the
3 decision-making or the qualifications of people
4 that were hired by the transition to go into the
5 White House after the inauguration.

6 **Q.** But you just said a lot of the
7 individuals were still using their campaign e-mails
8 and so you were able to read some of these e-mails
9 on the campaign servers, did you not?

10 **A.** No, I definitely saw e-mails on it,
11 but as far as answering your question regarding the
12 qualifications to the plaintiff and campaign staff
13 or contract employees, that was -- you know,
14 qualifications to go into government service in the
15 White House was something that the transition
16 committee did. You would have to ask them.

17 **Q.** And again, your basis for the belief
18 that the transition committee did that, is federal
19 law; is that correct?

20 **A.** There is very specific statutory
21 regime for how this is handled and it was handled
22 according to that statutory regime in this case.

23 **Q.** How do you know it was handled
24 according to that statutory law?

25 **A.** Because I did review documents both



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1 publicly available documents showing that. And the
2 correspondence I saw showed that as well that the
3 decisions that were being made were by -- for
4 personnel were by transition officials. And so
5 there was a presidential transition from both
6 candidates, both major party candidates for the
7 presidency that goes back to the summer, and
8 actually before, of 2016 and that continues onto
9 the election and past the election up to the
10 inauguration.

11 **Q.** When you say there are quote,
12 "publicly available documents including
13 correspondence showing the decisions were made by
14 transitions officers," would you be able to supply
15 what those documents and correspondence are that
16 you're referring to?

17 **A.** Ma'am, I can certainly refer you to
18 the archive version of the transition that disclose
19 in some detail the way that the transition
20 occurred, but I was not asked, and have not been
21 asked for specific documents to produce.

22 **Q.** Would you be able to subsequently
23 produce -- subsequent to today produce those? Any
24 reason you wouldn't?

25 MR. BLUMMETTI: Objection. Asked and



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1 answered.

2 BY MS. DELGADO:

3 **Q.** No, I don't believe he has -- I don't
4 believe I had asked that.

5 **A.** Ma'am, if -- I of course would comply
6 with any subpoena that was given to us on behalf of
7 the campaign. I think we have complied with all
8 document requests.

9 **Q.** When you say that decisions are made
10 by transition officials, how do you know they were
11 wearing their transition hat versus their campaign
12 hat?

13 **A.** Because they were transition officials
14 acting on behalf of the transition.

15 **Q.** How do you know they were acting on
16 behalf of the transition?

17 **A.** Because staffing of federal government
18 positions in the White House or otherwise is a job
19 of the transition and so that's very clearly the
20 job that they had in the transition. Those were
21 the duties that they were performing.

22 **Q.** If we could look at the Number 11, the
23 current financial status of campaign.

24 **A.** Yes, ma'am.

25 **Q.** Could you speak to me about that

1 topic, please?

2 **A.** Yes, ma'am.

3 **Q.** Including the available assets, debts
4 and the winding up of the campaign financial
5 obligations?

6 **A.** As of December 31st, 2023, the entity
7 formerly known as Donald J. Trump for President
8 Inc. has \$518,249.18 in assets. It has \$17,142.43
9 in debt. The name of the entity is now Make
10 America Great Again PAC as the former campaign
11 continues through its wind down.

12 **Q.** I'm sorry, your last question as it
13 continues through what?

14 **A.** Through it's wind down.

15 **Q.** And when you say wind down, what do
16 you mean?

17 **A.** I was responding -- you said winding
18 up the campaign financial obligations, and simply
19 talking about the campaigns going after they're
20 done continuing through a wind down process. That
21 takes some time usually for a presidential
22 campaign.

23 **Q.** And this is the MAGA, Make America
24 Great Again PAC entity, which you believe is what
25 the 2016n and the 2020 campaign became?

1 MR. BLUMMETTI: Objection to form.

2 THE WITNESS: Let me be very specific
3 because there are pacs that have similar
4 names.

5 BY MS. DELGADO:

6 Q. Yes.

7 A. This is the Make America Great Again
8 PAC. Make America Great Again PAC is, you know,
9 has the same FEC identifier, for instance, and is
10 the same entity as the entity that was once Donald
11 J. Trump for President Inc. Its -- and its
12 financials are all reported on the FEC website
13 publicly.

14 Q. So it's your understanding of the 2016
15 and 2020 campaign became a PAC?

16 A. It did become a PAC in the spring of
17 2021, or maybe still winter of 2020, but in 2021 it
18 became Make America Great Again PAC.

19 Q. And what is that \$17,000 debt?

20 A. We can pull it up publicly. I didn't
21 actually see what the debt was, but that's what
22 publicly recorded the \$17,142.43 in debt.

23 Q. When you speak of a campaign's
24 financial obligations, how does it pay for its
25 legal counsel?



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1 **A.** There are -- and I'm sorry, which
2 topic are we under for this question?

3 **Q.** Number 11, campaigns financial
4 obligations.

5 **A.** So the Question Number 11 looks
6 specifically as to current final status. It
7 doesn't ask how particular payments are made. And
8 so in answering Question Number 11 I did not look
9 into how payments were made.

10 **Q.** I'm sorry, Mr. Binnall, but I do
11 believe it requires you to answer. It's clearly
12 asked for the campaign's financial obligations,
13 obligations to vendors, attorneys currently working
14 for the campaign clearly falls under that. So I'm
15 asking how does the campaign --

16 **A.** Ma'am, I -- I might be wrong here.
17 The version I have says current financial status of
18 DTP including total available assets, debts and the
19 winding of the campaign's financial obligations.
20 Is that the question for Number 11?

21 **Q.** Yep, that's it.

22 **A.** Okay. As to Question Number 11 I
23 looked to determine the status including the
24 assets, debts and the winding up.

25 **Q.** Okay. Same question?



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1 **A.** So same answer.

2 MR. BLUMMETTI: And objection to the
3 extent it falls outside the scope of
4 the notice filed.

5 BY MS. DELGADO:

6 **Q.** So your answer, Mr. Binnall, is that
7 you have no -- you can't answer 11 because you
8 didn't look into that?

9 **A.** That wasn't exactly my answer. My
10 answer is as I previously said and the record
11 shows.

12 **Q.** You what?

13 **A.** My answer is as I previously said and
14 the record shows.

15 MS. DELGADO: Can the court reporter
16 repeat the answer?

17 (Thereupon, the requested portion was
18 read back by the court reporter.)

19 BY MS. DELGADO:

20 **Q.** Okay. Mr. Binnall, if that's the
21 answer, perhaps I need to ask the question again.
22 It's not responsive.

23 Are you able to answer regarding how
24 the campaign pays its current financial obligations
25 to its attorneys?

1 MR. BLUMMETTI: Objection to the
2 extent the question falls under the noticed
3 topic. You can answer.

4 THE WITNESS: As to Question Number 11
5 that is not something that I looked at in
6 preparing for today's deposition because
7 that was not within the topic designated.

8 BY MS. DELGADO:

9 Q. We'll have to go to the judge on that
10 one. Okay.

11 Okay. Number 12, public statements
12 made by or on behalf of the Trump Campaign
13 concerning or regarding plaintiff. Anything on
14 that?

15 A. The campaign is not aware of any such
16 statements.

17 Q. 13, complaints or any concerns raised
18 by anyone regarding Boris Epshteyn or Omarosa
19 Manigault?

20 A. The campaign is not aware of any such
21 specific complaints during the relevant time
22 period.

23 Q. What is the relevant time period?

24 A. The 2016 campaign, general election
25 campaign.

1 **Q.** Why do you gather that that's the
2 relevant time period for 13?

3 **A.** Because these individuals of course,
4 you know, are -- are discussed a lot and they are
5 included on a number of e-mails and so I was
6 limited as to how I kind of searched for that
7 topic, which was extremely broad. And so I did my
8 best to go through the e-mails available to me to
9 see if there were any -- any such complaints and I
10 was not able to locate any.

11 **Q.** You searched all e-mails available to
12 you in 2016 and 2020?

13 **A.** Certainly not every -- I did not look
14 at every single e-mail from the 2016 and 2020
15 campaign, which would have probably taken
16 centuries. I'm not exaggerating, it probably would
17 take centuries.

18 I did do my very best in order to see
19 if in that relevant time frame I could locate any
20 complaints about either Mr. Epshteyn or
21 Ms. Manigault and I did not find any.

22 **Q.** Just to be clear, Mr. Binnall, I
23 didn't ask if you read every e-mail. I agree with
24 you that would take centuries. I said if you
25 searched every e-mail.



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1 **A.** Well, I -- I could not come up with a
2 way to -- that would -- or a search term on that
3 would sufficiently narrow that down. Certainly
4 there's -- yeah, so for the search that I was able
5 to do, that was -- I was not able to locate any
6 such complaints or concerns. Concerns is a very
7 broad word.

8 **Q.** Go ahead.

9 **A.** Yeah, I was not able to locate
10 anything that would show an answer to Number 13.

11 **Q.** What was the keyword search that you
12 ran?

13 **A.** Ma'am, I didn't keep a record of the
14 keyword searches that I ran, as I previously
15 disclosed to you. But they're are a number of
16 e-mails that I went through in order to try to find
17 an answer to your questions. I spent a decent
18 amount of time doing so, but I was not able to find
19 anything regarding that.

20 **Q.** And even still for this topic you
21 didn't think to call or speak to or reach out to
22 the HR director?

23 MR. BLUMMETTI: Objection to form.

24 THE WITNESS: Ma'am, I did not believe
25 that was necessary in order to answer your

1 question.

2 BY MS. DELGADO:

3 Q. I'll rephrase it. In Number 13, given
4 that you speak of the breadth of the number of
5 e-mails and the difficulty, in your opinion, of the
6 search, did you then at least for this topic
7 consider reaching out to the HR director?

8 A. No, ma'am, I did not.

9 Q. Why not?

10 A. Because as I previously disclosed, I
11 believe that the best way to look at the records
12 especially in the length of time, you know, it's
13 several presidential cycles ago, that the best way
14 to get an answer to that would be to go through
15 records and that is what I did.

16 Q. But you found nothing, correct?

17 A. Correct, I found nothing.

18 Q. So at that point did you not think
19 perhaps I should go to the HR director and ask her?

20 A. No, ma'am, I did not.

21 MR. BLUMMETTI: Objection to form.

22 BY MS. DELGADO:

23 Q. Okay. Number 14 is communications
24 about any potential or actual law firm employment,
25 et cetera, you can read it for yourself, to

1 plaintiff from December 2016 onward, et cetera.

2 Can you speak to me about what you
3 found there?

4 **A.** Yes. The campaign was unable to
5 locate any such documents. We did see that there
6 was a number of communication that some of which
7 was forwarded to us that included you, but there
8 was -- as far as anything about potential
9 employments or contracts during the 2020 election
10 cycle we found nothing.

11 **Q.** And that was purely based on a search
12 you ran in the 2M database?

13 **A.** And the search I had the vendor run as
14 well.

15 **Q.** I'm sorry?

16 **A.** And the search that I had the vendor
17 run as well.

18 **Q.** Did you reach out to anyone about it?

19 **A.** Only the vendor and -- yeah, only the
20 vendor. Other than that I reviewed documents.

21 **Q.** So if I were to tell you there was an
22 offer communicated to me to remain on the campaign
23 in the spring of 2017, that does not ring a bell to
24 you at all?

25 **A.** I did not see that.



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1 **Q.** Did you speak to Jones Day given that
2 you were in this respect part of the campaign
3 regarding what they might have?

4 **A.** No, ma'am, I did not speak to Jones
5 Day.

6 **Q.** Why not?

7 **A.** Because it was not necessary to
8 find -- to do the research to respond to the
9 questions that you designated in your 30(b)(6)
10 notice.

11 **Q.** But you say you found nothing and you
12 also said earlier that Jones Day was essentially
13 put in charge once the campaign became aware of my
14 pregnancy. So given that, did you think you should
15 reach out to Jones Day?

16 **A.** Well, that's not exactly what I said.
17 However, no, just because they conducted the
18 internal investigation I did not believe it was
19 necessary to reach out to Jones Day in order to
20 discuss that investigation.

21 **Q.** And you found -- go ahead. I'm sorry.

22 **A.** And I looked at the documents that the
23 campaign had.

24 **Q.** Okay. And you found nothing -- I
25 presume your answer covered nothing about a

1 potential employment offer for 2020; is that
2 correct?

3 **A.** Correct.

4 MR. BLUMMETTI: Objection to form.

5 BY MS. DELGADO:

6 **Q.** Sorry? Sorry?

7 **A.** Correct, I was not able to find
8 anything regarding an offer of employment for the
9 2020 presidential election.

10 **Q.** What about discussions of potential
11 employment?

12 **A.** No, ma'am.

13 **Q.** Did you speak to anyone from the 2020
14 leadership?

15 **A.** No, ma'am.

16 **Q.** For 15 do you have any knowledge of
17 communications that you can speak to here today
18 with Eric Trump?

19 MR. BLUMMETTI: Objection to form.

20 BY MS. DELGADO:

21 **Q.** I'm sorry, I'm thinking and reading at
22 the same time. Let me rephrase.

23 For Number 15 communications with Eric
24 Trump about the plaintiff, does the campaign have
25 that?

1 **A.** The campaign is aware of no such
2 communications.

3 **Q.** What about from campaign counsel to
4 Eric Trump?

5 **A.** Well --

6 MR. BLUMMETTI: Objection to form for
7 attorney-client privilege, but you can
8 answer if you can.

9 THE WITNESS: Yeah, obviously I'm not
10 going to disclose anything that's
11 privileged. That being said, I'm aware of
12 no unprivileged communications.

13 MS. DELGADO: Sorry, the objection on
14 the basis of attorney-client privilege is
15 what exactly, Mr. Blummetti?

16 MR. BLUMMETTI: Just to the extent it
17 calls for any information protected by the
18 attorney-client privilege for the reasons
19 that we discussed during Mr. Trump's
20 deposition.

21 MS. DELGADO: Right. And for the
22 record Mr. Trump was at the Trump
23 organization during that time.

24 Mr. Blummetti, your position is there
25 would be attorney-client privilege there



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1 because -- potentially because Mr. Trump,
2 Eric, acted as an agent of the campaign?

3 MR. BLUMMETTI: My objection is sort
4 of hypothetical at this juncture. I was
5 just directing Mr. Binnall not to answer
6 any questions that go to privilege. I
7 don't even know whether he saw any such
8 documents.

9 BY MS. DELGADO:

10 Q. What about 16, Mr. Binnall?

11 A. The campaign is aware of no such
12 communications.

13 Q. When you say the campaign is not aware
14 of any, why is it you don't say the campaign didn't
15 have any communications? It seems you're trying to
16 buildup offer there, Mr. Binnall. Am I
17 misunderstanding your answer?

18 A. No, it's simply because, you know,
19 I've told you that the due diligence that we did
20 try to find answers to your questions. And by
21 doing that we were not able to find any such
22 communications. And I wouldn't expect that we
23 would frankly find and, you know, the campaign
24 server in a period of late 2017, early 2018
25 employment and termination records regarding



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1 America First Policies or America First Action PAC.

2 I think you would have to ask them.

3 Q. Fair enough. Going back to 15, you
4 didn't find any record of communications between
5 the campaign or campaign counsel with Eric Trump in
6 say October of 2017? You found none at all in the
7 search to 2017 as well?

8 MR. BLUMMETTI: Objection to the form.

9 BY MS. DELGADO:

10 Q. Let me rephrase it.

11 Did you search 2017 the year as well?

12 A. There were some e-mails from
13 specifically in early 2017. That being said, and
14 again being very specific not to go into anything
15 that may or may not exist that would be
16 attorney-client privilege, I did not see any
17 communications with Eric Trump about you that would
18 have been using a campaign medium.

19 Q. Did you speak to the campaign's
20 counsel at that time which was Larry Rosen?

21 A. No, ma'am, I did not.

22 Q. Why not?

23 A. Ma'am, could I ask for just a brief --
24 I've got my op par calling me. Could I ask for a
25 brief two or three-minutes recess.

1 Q. Absolutely.

2 A. Thank you.

3 Q. Five minutes?

4 A. Fine.

5 (Thereupon, a break was had from 12:49
6 to 12:53 p.m.)

7 BY MS. DELGADO:

8 Q. So back on the record, I'm not even
9 sure if I said we were going off the record, but
10 nonetheless.

11 Okay. So Number 17, Mr. Binnall, I'm
12 sorry, we were on 15. I was asking you why you
13 hadn't reached out to Larry Rosen who was campaign
14 counsel at the time regarding whether there had
15 been any communications by him on behalf of the
16 campaign with Eric Trump?

17 A. Because if there were any documents
18 regarding any such communications, and it
19 specifically of course didn't mention Mr. Rosen
20 specifically, those should be in the campaign
21 documents that I had access to, so I searched that
22 in order to answer your question. And that, which
23 would have of course included all e-mails and
24 whatnot, showed that there was -- I was aware of no
25 such communications.

1 **Q.** Why would campaign counsel's e-mails
2 be on the campaign's server?

3 **A.** I wouldn't expect that they would, but
4 for Question Number 15 communications, e-mail,
5 which parentheses, e-mails, text messages, letters,
6 memos and the like with Eric Trump about plaintiff,
7 it certainly didn't specify anyone specifically who
8 I would look at.

9 So my due diligence in answering that
10 question was to look at the documents retained by
11 the campaign in order to determine if there were
12 any such communications and I was unable to find
13 any.

14 **Q.** It didn't occur to you that an
15 attorney might have been the one conducting the
16 communications?

17 **A.** Ma'am, I could have of course thought
18 of a hundred different hypotheticals, but using my
19 best efforts and best resources in order to answer
20 that question, I made it so I looked at the
21 documents that the campaign had.

22 **Q.** So Number 15 you can only speak to it
23 today on the basis of the campaign documents on the
24 server, correct?

25 **A.** And -- yeah, the individuals that, you



1 know, that I spoke with. And I was unable using my
2 best efforts to locate any such communications.

3 Q. When you say the individuals that you
4 spoke with, that would be Mr. Blummetti and the 2M
5 vendor?

6 A. Correct.

7 Q. Wouldn't Mr. Blummetti had told you we
8 have something in that regard since it was his
9 firm?

10 MR. BLUMMETTI: Objection to form.

11 BY MS. DELGADO:

12 Q. Let me rephrase that.

13 A. Yeah, ma'am, without going --

14 Q. I'll rephrase it. Thank you.

15 You say you spoke to Mr. Blummetti
16 about 15?

17 A. Yes.

18 Q. Did Mr. Blummetti tell you that there
19 were communications from his firm to Eric Trump
20 about me?

21 A. I wouldn't expect that he would have
22 disclosed any -- any -- I think it would have been
23 protected by attorney-client privilege or work
24 product, but no, no such communications were
25 disclosed.

1 **Q.** And you're aware as an attorney
2 yourself that the privilege issue in your 30(b)(6)
3 witness you're treated as the campaign itself,
4 correct?

5 **A.** Yes, ma'am.

6 **Q.** Okay. Number 17, Mr. Binnall, can you
7 speak to me about the funding of legal fees, which
8 I guess brings us back to what we were arguing
9 about earlier?

10 **A.** Here's what I was able to do because I
11 was unable to, for instance, locate how much was
12 spent by a particular firm on a particular matter.
13 So what I did is I looked in the publicly available
14 FEC reporting to determine how much money had been
15 paid to Mr. Blummetti's firm over the past number
16 of years. And that amount for calendar year 2023
17 was \$155,522.01.

18 **Q.** Sorry, Mr. Binnall, you cut out. I
19 hate to interrupt you. I just wanted to let you
20 know you cut out. From what year?

21 **A.** That was 2023.

22 **Q.** 2023 was how much?

23 **A.** \$155,522.01.

24 **Q.** Okay.

25 **A.** For the years 2021 until 2022, so a



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1 two-year period, it was \$1,340,083.19. And for I
2 believe the years 2019 and 2021 it was 1,340,083 --
3 you know what, I apologize. I misspoke.

4 Q. Okay.

5 A. Let me go back. For the years 2021 to
6 2022, it was \$614,894.16.

7 And then for the period of 2019 and
8 2021 it was \$1,343,083.18.

9 And again, I don't know what matters
10 those were for, but that's the amount that was paid
11 to Mr. Blummetti's firm during that period which is
12 the best way I could find out to answer your
13 question.

14 Q. Why does it start at 2019?

15 A. I mean, I'd be happy to go back
16 further if you would like and, you know, perhaps --
17 I mean, that is all publicly available, very easily
18 publicly available information. But we can pull up
19 that if you'd like and we can go back to -- tell me
20 when you want to start, we can do that.

21 Q. Yes, I'd like to go back. We
22 definitely will. But I will note when you say I
23 don't know what these are for, what cases these are
24 for, you were specifically asked. I can find this
25 myself, this information you just gave me. This is



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1 public as you just said.

2 The topic was about for those cases in
3 which plaintiff is a party.

4 **A.** Correct, and that -- and this was as
5 much as having the information available to me.
6 This is as much as I was able to narrow it down.

7 **Q.** Again, Mr. Binnall, you're not a
8 member of the public. You're here as the campaign.
9 I'm asking the campaign --

10 **A.** Correct.

11 **Q.** -- right now how much have you paid in
12 legal fees and costs for matters involving me?

13 **A.** As far as the records of the campaign
14 has, that is the extent of the information.

15 **Q.** So you're telling me the campaign
16 doesn't have records that show we were billed from
17 Jared Lummetti and Larry Rosen -- and/or Larry
18 Rosen's firm a few years ago X amount for the A.J.
19 Delgado matter this month? You're telling me the
20 campaign gets a blind bill?

21 **A.** Not that I was able to find. And so
22 that's -- so the information that I have is what I
23 disclosed to you. And that was the information
24 that after looking that I was able to find.

25 **Q.** So you weren't able to answer for 17,



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1 correct?

2 **A.** I was able to answer to the only
3 extent that I did answer.

4 **Q.** Mr. Binnall, were you able to answer
5 Number 17, which is the legal fees or costs in
6 which plaintiff is a party?

7 **A.** I was only able to answer as to the
8 amount paid to Mr. Blummetti's firm in that
9 relevant time frame.

10 **Q.** So is that a no?

11 MR. BLUMMETTI: Objection to form.

12 THE WITNESS: I was able to answer the
13 way that I did answer. I don't know how
14 else to answer your question.

15 BY MS. DELGADO:

16 **Q.** Are you able to tell me what was spent
17 on my case in particular?

18 **A.** No, ma'am, I'm not available to.

19 **Q.** Okay. Fair enough. Thank you.

20 What other cases -- how many other
21 cases does Mr. Blummetti's firm handle for the
22 campaign?

23 **A.** I don't know. That wasn't a
24 designated topic so I didn't look at that.

25 **Q.** Sure. Fair enough. It's not. I'm

1 trying to find the answer I need which was a
2 designated topic by process of elimination, but if
3 we could go back and you said you could go back
4 past 2019. Certainly I do want to go back to 2016.
5 So could you provide me the numbers for 2016
6 through 2018?

7 **A.** Can I make a suggestion?

8 Q. Sure.

9 **A.** Can I make a suggestion that we get
10 through everything else and then we take a break
11 and I'll pull up the website and I'll give you the
12 answer to that.

13 Q. Perfect. I appreciate the efficiency.

14 A. Yep.

15 **Q.** And we still have that one exhibit to
16 go back to at the end. Okay.

17 So Number 18 -- oh, I'm sorry going
18 back to Number 17, Mr. Binnall, who paid me, the
19 campaign, the MAGA entity you just mentioned
20 earlier, who paid these bills, these amounts?

21 **A.** So of course the name of the entity
22 has changed once over time, but these were all paid
23 by Make America Great Again Inc. I'm sorry, no,
24 no, that's wrong. These were all paid by Make
25 America Great Again PAC.

1 **Q.** Okay. Have any fees or costs for --
2 and I'm sticking to 17 -- for my case come out of
3 any other PAC or entity?

4 **A.** Not that I'm aware of.

5 **Q.** Does the Save America PAC ring a bell?
6 Have they perhaps paid anything in my case that
7 you're aware of?

8 MR. BLUMMETTI: Objection to the form.

9 BY MS. DELGADO:

10 **Q.** Has the Save America PAC paid any
11 legal fees or costs in my case?

12 **A.** So I'm not designated on the behalf of
13 Save American. You would have to ask them. I'm
14 aware of what was paid out of the entity that I am
15 here to answer on behalf of.

16 And yeah, anything as to Save America
17 you can ask them or you could look at the FEC
18 reporting.

19 **Q.** No, but Mr. Binnall, you're here on
20 behalf of the campaign because the --

21 **A.** Correct.

22 **Q.** -- campaign is the defendant.

23 **A.** Correct.

24 **Q.** And I'm asking did anyone else pick up
25 or pay or contribute to any legal fees or costs in

1 the case of which your entity is a defendant. I
2 fully realize you don't speak up to Save America.

3 **A.** Right. And so if Save America paid
4 directly any of the legal fees, that's not
5 something that I have seen. But I wasn't able to
6 locate the payments that came out of Make America
7 Great Again Inc. -- I'm sorry, Make America Great
8 Again PAC, which -- or its predecessor name Donald
9 J. Trump for President Inc. Save America
10 disbursements are publicly available.

11 **Q.** Has the campaign paid for any -- let
12 me rephrase that.

13 Has the campaign funded or contributed
14 even indirectly or directly for any legal fees or
15 costs regarding the Family Law Action in which I am
16 a respondent in Florida?

17 **A.** So I am -- I do not believe so. I
18 have not seen any payments for that action. And in
19 frankness, I did not know to look for that exact
20 action and I am very happy if you give me the name
21 of the law firms involved to see if there are any
22 disbursements to those law firms.

23 **Q.** Sure. They would -- I can -- if you
24 want to jot them down.

25 **A.** Yes, ma'am. Go ahead.



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1 **Q.** It's Sandy Fox, PA?

2 **A.** I'm sorry, what?

3 **Q.** Sandy Fox, PA.

4 **A.** Sandy Fox, PA.

5 **Q.** Yes. Or it would be potentially also
6 to payments directly to Jason Miller that you find
7 that are outside of the compensation structure.

8 And I doubt this was done plainly so I'll save you
9 some time, but it's unlikely you'll find anything
10 because it's always done in plain sight. But if
11 you'd like to take a look I would appreciate that.

12 **A.** I'll take a look. I'm sure there will
13 be payments to Jason Miller. It's not -- if
14 there's anything that is for reimbursement of legal
15 fees or something to Jason Miller, I won't publicly
16 disclose that.

17 **Q.** Okay. Number 20 I believe I don't
18 want to delay --

19 **A.** Is there a 20?

20 **Q.** I'm sorry, Number 18 I believe your
21 position is that you have no answer on that so I
22 won't waste our time making you repeat your earlier
23 answer.

24 If you want to take that break now --
25 well, just to be clear, you did not search the --

1 the 2020 campaign you did not search that for the
2 HR complaints, correct?

3 **A.** I did not.

4 **Q.** And your reason for that was?

5 **A.** I think as I already discussed and
6 I'll rely on my previous answer for that.

7 **Q.** And I'm sorry, you answered it
8 previously, but I'm afraid if I would ask the court
9 reporter, it's going back so far. Would you mind
10 answering again? I won't hold you to it if it's
11 inconsistent with your prior answer.

12 MR. BLUMMETTI: Objection.

13 THE WITNESS: There's voluminous
14 heavily, heavily voluminous documents and
15 so I used my best efforts in order to
16 narrow down the topics under the relevant
17 time period in order to do my search, in
18 order to do a reasonable search. Not
19 something where I, you know, I
20 theoretically could look at every single
21 e-mail, although as we've discussed that
22 would literally take centuries.

23 And so doing a reasonable search I
24 limited it to the time period, a broad time
25 period that was relevant to this case.



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1 BY MS. DELGADO:

2 Q. But it wouldn't have taken centuries
3 to speak to the HR director, right, maybe
4 30 minutes?

5 MR. BLUMMETTI: Objection to form.

6 THE WITNESS: I think I've already
7 answered that.

8 BY MS. DELGADO:

9 Q. Do you know there were complaints
10 against Jason Miller in 2020? Is that why you
11 didn't conduct the search?

12 MR. BLUMMETTI: Objection to form.

13 THE WITNESS: I have no personal
14 knowledge of that.

15 BY MS. DELGADO:

16 Q. Have you heard anything?

17 A. As I just said, I have no personal
18 knowledge of that.

19 Q. Isn't it true that it wouldn't have
20 taken long to limit your search to Jason Miller
21 complaints in 2020?

22 MR. BLUMMETTI: Objection to form.

23 BY MS. DELGADO:

24 Q. Let me rephrase it.

25 Would it have been highly



1 time-consuming to at least run a search of
2 complaints against Jason Miller in the 2020
3 campaign?

4 **A.** Ma'am, I don't know how long it would
5 have taken to do it. I know for the questions that
6 were designated if I would have done it over the
7 entire existence of Donald J. Trump for President,
8 Inc. and it's Make America Great Again PAC that
9 would have been an extremely onerous task. And so
10 I did a reasonable search and I limited it to the
11 time frame at issue, the 2016 general election
12 cycle.

13 **Q.** And to be clear, the request, the
14 topic that you were asked to speak on did not limit
15 it to the 2016 election cycle, correct?

16 **A.** I don't know how else to answer your
17 question other than what I've already answered it
18 to on that.

19 **Q.** No, I just mean the literal request,
20 did it say limited to 2016 election?

21 **A.** The original request was
22 extraordinarily broad and there's no way that I
23 reasonably could have done that in the time frame
24 to prepare for a deposition that it also wasn't,
25 you know, unduly burdensome.

1 So I tried to give you the best
2 answers that I could by doing a thorough search in
3 a reasonable manner that wouldn't have been unduly
4 burdensome and at the same time having prepared
5 time for this deposition.

6 **Q.** It's your testimony that Number 4
7 which asked for any all claims of sexual harassment
8 or for unlawful discrimination or for pregnant
9 discrimination in the Trump Campaign is
10 extraordinarily broad?

11 MR. BLUMMETTI: I object to the
12 question to the extent it pertains to any
13 campaign other than the 2020 campaign as to
14 relevance.

15 MS. DELGADO: It's not irrelevant, Mr.
16 Blummetti. It's the same actors. In fact,
17 it's the same individual who impregnated
18 me, my supervisor, was once again hired and
19 placed in a supervisory role in the 2020
20 campaign. I don't think anyone would
21 consider that irrelevant. In fact, it'd be
22 the first place I would look. So just
23 explaining why I find it highly relevant.

24 BY MS. DELGADO:

25 Q. So this question remains, Mr. Binnall,

1 do you consider asking that you speak to claims of
2 discrimination or sexual harassment in the 2016 and
3 2020 cycle, should have included 2024, but even if
4 you -- you limited it to 2016 and 2020, you
5 consider that as an extraordinarily broad, your
6 words, request?

7 **A.** So let me unpack that question a
8 little bit.

9 Regarding 2016 and 2020, it was --
10 this was unbound by time. And that in the question
11 for an entity that over two presidential campaign
12 titles employed a large number of people. And so,
13 yes, it would have been extremely burdensome so
14 look at the entirety there.

15 And so what I did -- and as far as
16 2024 goes, unpacking that part of the question,
17 that's not this entity. And so it's not something
18 that I have access to. And so you would have to
19 ask that entity anything about what's going on in
20 the 2024 election.

21 And so, yes, I took and used my best
22 efforts to get you answers to your questions using
23 a -- using reasonable efforts by -- by looking at
24 the relevant time frame, which was the general
25 election campaign in 2016.

1 BY MS. DELGADO:

2 Q. You also said it was quote, "unduly
3 burdensome" end quote, the request. Isn't it true
4 that it wouldn't be unduly burdensome to simply
5 call the HR director for 2016 and the HR director
6 for 2020, assuming they were even different
7 individuals?

8 MR. BLUMMETTI: Objection to the form.

9 THE WITNESS: I don't know. You'd
10 have to take that up with somebody that
11 they could give you a legal answer. I'm
12 just --

13 BY MS. DELGADO:

14 Q. You called it unduly burdensome. Why
15 do you consider it unduly burdensome, the request,
16 when a reasonable person --

17 A. The request was not for me to call any
18 individual person. What I testified to is, to give
19 you the answer to your question, I did not believe
20 that I needed to call those individuals. I believe
21 I had access to a voluminous document repository
22 and other publicly available records and other
23 records that are directly involved in this
24 litigation. That's what I looked at.

25 Q. But Mr. Binnall, you just testified



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1 that the reason you're not able to give me an
2 answer about 2020 here today, which is one of main
3 reasons you're here and one of the top things I
4 needed to get information on, is because there are
5 too many e-mails from 2020 and it's too voluminous.

6 So I asked you isn't an easy obvious
7 alternative, which takes ten minutes to call or
8 contact the HR director and ask them, hey, what
9 were the complaints you heard of or recall from
10 2020?

11 MR. BLUMMETTI: Object to form.

12 THE WITNESS: I did not do that nor
13 did I believe it was necessary or
14 productive to do that in the -- or that --
15 I'm sorry, let me restate that.

16 I didn't believe that was a
17 reasonable -- reasonably necessary thing to
18 do in order to answer your questions and I
19 did that as fairly as I could.

20 BY MS. DELGADO:

21 **Q.** But you're not asking the topic; is
22 that right? You --

23 **A.** I am. I just put a -- out of
24 necessity limited to a reasonable time frame. I
25 think I've been very clear about what I did. I

1 don't know how else to answer these questions that
2 you're getting at because I think I've -- we're
3 going to keep going round and round for the same
4 thing, which is this is what I did and I explained
5 to you the exact reasons why I did it that way. I
6 don't really have anything else to say on this.

7 **Q.** Number 4 was not answered, which you
8 were brought here to answer for on behalf of the
9 campaign speaking as the campaign because 2020 you
10 said was too voluminous to search for. And you've
11 stated that you therefore have no answer for me at
12 all about any complaint of any kind made in 2020;
13 is that correct?

14 **A.** I do not have any information for you
15 regarding personnel matters of 2020.

16 **Q.** And Jason Miller was in a supervisory
17 position again in the 2020 campaign effort, was he
18 not?

19 MR. BLUMMETTI: Object to the form.

20 THE FOREMAN: You know, I wasn't
21 designated to look into what his position
22 was in 2020 so I don't have any official
23 answer as to whether it was supervisory or
24 not. From my personal recollection, my
25 personal recollection is that he was.



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1 BY MS. DELGADO:

2 Q. Who would know, Mr. Binnall, if not
3 you, not in this 30(b)(6), Lucia -- was Lucia --
4 did you even ask who the HR director was in 2020?

5 A. That was -- no, I did not ask who the
6 HR director was in 2020.

7 Q. You're the campaign here today. I'm
8 asking --

9 A. Right. No, I did not ask that
10 question.

11 Q. Okay. Who -- if you -- regardless of
12 whether you asked it or didn't ask it, who was the
13 HR director in 2020?

14 A. I have no personal recollection.

15 Q. But I'm asking the campaign, you're
16 the campaign, who was it? I don't know about your
17 recollection, you don't know, you can't tell me
18 here today who the campaign's HR director was in
19 2020?

20 A. Ma'am, I don't have that -- I don't
21 have that information, no, on behalf of the
22 campaign or personal.

23 Q. Was there an HR director in the 2020
24 campaign election effort?

25 A. As I have stated, I limited my review



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1 of those the way that I had previously testified so
2 I did not look into that matter. It needed to be
3 bound by time. And in order to do a reasonable
4 search and so I did not look at that.

5 **Q.** Did you ask whether there was an HR
6 director in 2020?

7 **A.** Ma'am, I think I've already answered
8 that question.

9 **Q.** It's a different question. I asked if
10 you had inquired whether there was?

11 **A.** Are you saying inquired and asked are
12 different?

13 **Q.** Did you inquire from Mr. Blummetti or
14 anyone in preparation for this deposition whether
15 there was an HR director --

16 **A.** I've already answered that question,
17 ma'am.

18 **Q.** I don't believe I asked you that
19 already.

20 **A.** I already answered that question. You
21 can rely on the record for that.

22 **Q.** I've asked you whether you inquired if
23 there was an HR director?

24 MS. DELGADO: Can the court reporter
25 read back the question if I did?

1 THE WITNESS: Ma'am, I'll just -- I'll
2 save the time. No, I did not. For 2020 I did not.

3 BY MS. DELGADO:

4 Q. Okay. Mr. Binnall, were you told not
5 to look into the 2020 complaints?

6 A. No, ma'am.

7 Q. Was it suggested to you that you leave
8 2020 complaints alone?

9 A. No, ma'am.

10 Q. Okay.

11 A. Ma'am, it's simply a matter of the
12 question --

13 Q. That answered my question.

14 A. Okay.

15 Q. Okay. Let's go over that elusive
16 exhibit. Let's try again. I'm going to see if I
17 convert it to a PDF if it works better for you in
18 the chart or -- I'm not even sure if --

19 MS. DELGADO: I do have to show it on
20 the screen, do I Ms. Boyd? Am I allowed to e-mail
21 it to the court reporter and to Mr. Binnall?

22 (Thereupon, a break was taken from
23 1:22 p.m. to 1:30 p.m.)

24 BY MS. DELGADO:

25 Q. Okay. Back on the record.



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1 **A.** So for the period including the years
2 2015 and 2016 the Larroco Law Firm was paid
3 \$80,999.76 by Donald J. Trump for President, Inc.

4 And in the 2017/2018 time period that
5 firm was paid \$404,774.48.

6 **Q.** Okay. And you pulled this just from
7 the FEC disclosures?

8 **A.** Correct.

9 **Q.** Okay. So that's publicly available
10 information, correct?

11 **A.** Yes, ma'am.

12 **Q.** Okay. So, again, you were not able
13 to -- you're not able to speak to what was paid for
14 my case or cases in which I am a party as listed in
15 Topic 17, correct?

16 **A.** Correct.

17 **Q.** Okay. Would you be able to obtain
18 that information?

19 **A.** Ma'am, I've told you that the ways
20 that I would have went about trying to find out
21 that information and this was the only information
22 I was able to find.

23 **Q.** But Mr. Blummetti's the person who
24 prepared you for this 30(b)(6) appearance, correct?

25 **A.** He was -- yeah, he was one of the

1 sources that I went to for information.

2 Q. Right. And it's Mr. Blummetti's firm
3 so how is it you just can't ask Mr. Blummetti to
4 educate on what Mr. Blummetti's firm has been paid
5 for my case, which is --

6 A. Miscommunication as my firm, but go
7 ahead.

8 I'm not -- I'm not sure what records
9 here he does not have on that, but this was the
10 best way that I could think of to get you answers
11 to your question.

12 Q. Did you ask him how much have you
13 received for, and I'm quoting, "any action in any
14 state in which plaintiff is a party"?

15 A. What I can say is without remembering
16 exact phrasing of our conversation, what I can tell
17 you that is that we discussed the best way to get
18 you an answer to that question and this is the best
19 that I could come up with.

20 Q. It's Mr. Blummetti's firm --

21 MR. BLUMMETTI: Objection to form.

22 BY MS. DELGADO:

23 Q. Okay.

24 A. The firm name is -- what called the
25 records the firm name, it's not my firm.

1 **Q.** Correct. He is a partner. So you're
2 saying that Mr. Blummetti had no way that -- that
3 you inquired or asked but Mr. Blummetti had to say
4 to tell you what he has been paid for his work on
5 my case?

6 **A.** No, ma'am, that's not what I said.

7 **Q.** Okay. Could you, please, clarify if I
8 misunderstood?

9 **A.** Ma'am, I said that we discussed the
10 answer to this question and the best way to try to
11 get you an answer and the way that I came up with
12 is to look at the filings as to how much was paid
13 to his firm and that's what we did.

14 **Q.** But Mr. Binnall, you say you discussed
15 the best way to get me an answer to Topic 17.
16 Clearly you're a smart man, you know full well that
17 the public disclosures are not going to give me an
18 answer to 17. The public disclosures just tell me
19 how much Mr. Blummetti or the firm that we're
20 speaking of has been paid in total. It could be
21 for 20 cases, it could be for just my case. You
22 are aware of that, weren't you?

23 **A.** Ma'am, that was a long question and
24 I'm not exactly sure what you're asking.

25 **Q.** Let me break it down.

1 You said that you discussed what was
2 the best way to get me an answer to Topic 17. So
3 your testimony is that the best way that you could
4 find to get Topic 17 was to just cite the FEC
5 disclosures of what Mr. Blummetti has been paid in
6 total?

7 **A.** Yes, ma'am.

8 **Q.** Is that correct?

9 **A.** Yes, ma'am.

10 **Q.** Okay. I'm going to object to that. I
11 probably need another 30(b)(6) just for the record,
12 as well as on the question of sexual harassment and
13 pregnant discrimination and other types of
14 discrimination complaints not being answered for
15 the 2020 election effort.

16 Let's try to wrap up then with -- I
17 think the only exhibit I'm going to use --

18 MS. DELGADO: Court reporter, I'm
19 going to mark this Exhibit 1.

20 (Plaintiff's Exhibit No. 1,
21 Spreadsheet, was marked for
22 Identification.)

23 BY MS. DELGADO:

24 **Q.** And Mr. Binnall, have you had a chance
25 to review what I sent you via e-mail, which was a



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1 copy has also been to Mr. Blummetti and to Ms.
2 Boyd, the court reporter. Are you able to open
3 that, sir?

4 **A.** Ma'am, I did not get that e-mail.

5 **Q.** Oh, okay. Let's see.

6 MS. DELGADO: Ms. Boyd, did you
7 receive it? Or Mr. Blummetti?

8 THE WITNESS: Oh, wait. I've got it.
9 I got it.

10 MS. DELGADO: Maybe check your spam
11 folder, Mr. Binnall.

12 THE WITNESS: Yeah, I found it. Yes,
13 ma'am, I've been able to review it.

14 BY MS. DELGADO:

15 **Q.** Okay. Thank you.

16 This is a spreadsheet reflecting the
17 payments and I'd like for you to tell me if
18 anything -- and feel free of course to take your
19 time in reviewing it -- but please tell me if any
20 of this is incorrect. This spreadsheet in general
21 totals I believe a little over 4 million in
22 payments made to Binnall Law Group or Harvey &
23 Binnall from either the Trump Campaign or a Trump
24 affiliated PAC such as Make America Great Again PAC
25 or Save America PAC. If you want to take a look



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1 and let me know if that looks accurate to you.

2 **A.** Ma'am, there's nothing in here that
3 looks inaccurate to me. As a matter of fact, this
4 looks to me to be pulled directly off of the FEC's
5 websites.

6 **Q.** Okay.

7 **A.** And it's not something that I can
8 recreate because of course this doesn't go directly
9 to invoices, but there is no reason that I would
10 have to question anything. Only to say that I know
11 at least one of these, and I'm sure a number of
12 these is not for legal fees, it's for expenses.

13 So for instance, the payment on
14 2/14/2023 was not for legal fees, that was for
15 expenses. And there are a number of those other
16 payments, a number of those include expenses rather
17 than legal fees.

18 **Q.** Okay. But in the disclosures they
19 were described as legal consulting.

20 **A.** Correct.

21 **Q.** So it's fair enough if -- I'm not
22 saying there's anything wrong with the description
23 as legal consult that includes cost.

24 **A.** Yeah, that's right.

25 **Q.** So -- okay. And so it's roughly about



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1 4 million since 2020; is that accurate?

2 **A.** The document speaks for itself, ma'am.

3 **Q.** Okay. And do you intend to continue
4 doing work for the Donald J. Trump legal needs for
5 Donald J. Trump Junior's legal needs and/or the
6 campaign's legal needs or former administration
7 officials' legal needs going forward?

8 **A.** Ma'am, I'm an attorney. I only serve
9 those people as long as I'm hired to do so. And as
10 of right now I'm engaged. I can't tell you how
11 long those engagements are going to last.

12 **Q.** Fair enough. Fair enough.

13 **A.** Yep.

14 **Q.** But would you -- you intend to
15 consider doing work for individuals in the Trump
16 orbit?

17 **A.** I have -- yeah, I have absolutely no
18 objection to continuing to serve the clients who I
19 currently serve.

20 **Q.** And I don't mean this to sound
21 disrespectful in any way, but would you say it
22 would be accurate to describe that working within
23 the Trump orbit and representing them has been
24 lucrative for your firm and for you?

25 MR. BLUMMETTI: Object to the form.



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1 THE WITNESS: I mean, it's -- yeah, I
2 don't think you'd probably dispute that --
3 that they are a client that has paid me a
4 good deal of money over the past number of
5 years.

6 BY MS. DELGADO:

7 Q. Fair enough. Okay. I don't really
8 have anything else, but to the extent Mr. Blummetti
9 has any questions for his own 30(b)(6) witness, I
10 doubt it, but I think that's about it. Let me just
11 double-check that I covered every topic. I believe
12 we did. And sorry if you could hear my dog. I
13 apologize.

A. No problem. That's a good sound.

15 **Q.** One last thing, Mr. Binnall, you
16 mentioned at the very beginning documents you
17 reviewed of which were e-mails, records produced in
18 discovery, pleadings and depositions and the
19 personnel file. You later clarified that it wasn't
20 a personnel file in the traditional --

21 **A.** That -- that may have been -- that's
22 as much as you can kind of put together, cobble
23 together a personnel file is what I looked at.

24 **Q.** Okay. And when you say what --
25 cobbled together, what was in that if you recall?

1 I'm just trying to make sure I have everything.

2 **A.** I'm talking about largely e-mails
3 and -- yeah, largely e-mails.

4 **Q.** Were you given something that was even
5 if nontraditional described as an A.J. or Arlene
6 Delgado quote unquote "personnel file"?

7 **A.** Not that I saw, no.

8 **Q.** Okay. And what did you review that
9 you considered to be part of an even informal
10 cobbled together personnel file?

11 **A.** E-mail communications regarding you
12 and including you.

13 **Q.** Just e-mails? Was it just e-mails?

14 **A.** I'm trying to think. From my memory
15 it's -- it was all e-mails. I looked at a good
16 number of things here in the recent past, but yeah,
17 I'm -- it's everything that -- every document that
18 I can recall is e-mails.

19 **Q.** Okay. And I gather those were also in
20 the records produced in discovery that you say you
21 reviewed?

22 **A.** Yes, ma'am.

23 **Q.** Or -- there was nothing you reviewed
24 that you considered part of what you described as a
25 personnel file that was withheld from discovery to

1 your knowledge?

2 **A.** Not to my knowledge.

3 **Q.** Or labeled in any -- okay.

4 **A.** Not to my knowledge.

5 **Q.** I don't think I have anything else.

6 No, I think that's it. I think that's it.

7 Okay. Well, thank you, Mr. Binnall.

8 I appreciate your time and it was nice to --

9 MR. BLUMMETTI: Read.

10 (Thereupon, the deposition concluded
11 at 1:43 p.m. with the reading and signing having
12 been not waived.)

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1 CERTIFICATE OF SHORTHAND REPORTER

2 STATE OF FLORIDA)
3) SS.
4 COUNTY OF DADE)

5 I, the undersigned authority hereby
6 certify that the foregoing transcript, pages 1
through 143 are a true and correct transcription of
the deposition of JESSE BINNALL, taken before me at
the time and place stated in the caption hereof.

7 I further certify that the said
8 witness was duly sworn according to law.

9 I further certify that I am not of
10 counsel to either of the parties to said cause or
otherwise interested in the event thereof.

11 IN WITNESS WHEREOF, I hereunto set my
12 hand and affix my official seal of office this 21st
day of March, 2024.

13
14
15
16
17 
GUERLIN KELLY BOYD, Reporter
18 Notary Public in and for the State of Florida
My Commission No. HH 055178
19 Expires: October 20, 2024

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA)

3 COUNTY OF DADE)

4

5

6

7 I, the undersigned authority, certify
8 that JESSE BINNALL personally appeared remotely
9 before me and was duly sworn.

10 WITNESS my hand and official seal this
11 21st day of March, 2024.

12

13

14

15

16

17 - - - - -  - - - -

18 GUERLIN KELLY BOYD
Notary Public State of Florida
19 My commission Expires: 10-20-24



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STATE OF FLORIDA)
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COUNTY OF DADE)

I, hereby certify that I have read the
manuscript pages 1 to 142 and find the
true and accurate.

Any corrections made by me are set forth on the errata page attached hereto.

(JESSE BINNALL)

Sworn to and subscribed before me on this,
____ day of _____, 2024.

Notary Public in and for the
State of Florida at Large.
My Commission expires:



4
TO: Jesse Binnall
5 c/o LAROCCA HORNIK ROSEN GREENBERG & BLAHA
The Trump Building
6 40 Wall Street
32nd Floor
7 New York, NY 10005

8 April 4, 2024
9

10 IN RE: ARLENE DELGADO v. DONALD J. TRUMP FOR
PRESIDENT INC., et al
11 CASE NO: 19 Civ. 11764 (AT) KHP)

12 Dear Jesse Binnall,

13 With reference to the examination of YOURSELF,
deponent in the above-styled cause, taken on
14 March 21, 2024, under oath, please be advised that
the transcript of the Deposition has been
transcribed and is awaiting your signature.

15 Please arrange to conclude this matter at your
earliest convenience. We would suggest that you
16 telephone this office and arrange an appointment
suitable for all concerned.

17 However, if this has not been taken care of by
May 4, 2024 we shall conclude the reading and
signing of said deposition has been waived, and
shall then proceed to file the original of the said
transcript with the party who took the deposition,
without further notice to any parties.

21 Sincerely,

22
23 -----
Guerlin Kelly Boyd, FPR

24 cc: All Counsel of Record.
25

ERRATA SHEET

F.R.C.P. RULE 1.310 PROVIDES IN PART:

(e) "...Any changes in form or substance that the witness wants to make shall be entered upon a separate correction page by the officer with a statement of the reasons given by the witness for making them..."

I, _____, do hereby certify that I have read the foregoing transcript of my deposition, given on March 21, 2024, and that together with any additions or corrections made herein, it is true and correct.

JESSE BINNALL



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